

Child Protection and Safeguarding Policy 2026-27

Policy Consultation & Review

This policy is available on both school websites and can be requested from either of the schools' offices. We also inform parents and carers about this policy when their children join our schools.

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

This policy is provided to all staff at induction, including our safeguarding response to those pupils who are missing from education, alongside our Staff Code of Conduct and Positive Behaviour policy. In addition, all staff are provided with Part One of the statutory guidance Keeping Children Safe in Education, DfE (2026) which should be read in full and understood by all staff. Staff will need to sign that they have read and understood all policies.

CONTENTS

1. Purpose & Aims
2. School Ethos
3. Roles & Responsibilities
4. Training & Induction
5. Filtering and Monitoring Systems
6. Procedures for Managing Concerns
7. Specific Safeguarding Issues
8. Recording & Information Sharing
9. Working with Parents
10. Child Protection Conferences
11. Managing Allegations
12. Other relevant policies
13. Safer Recruitment
14. Statutory Framework

Appendices

1. Local Safeguarding Procedures
2. Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting
3. Flow chart for raising a safeguarding concern about a child

1. Purpose & Aims

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

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

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

Our schools fully recognise their contribution to protecting children from harm and supporting and promoting good care of all registered pupils. The elements of our policy are prevention, protection and support.

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

2. Our Ethos

Our schools will establish and maintain an ethos where pupils feel secure, are encouraged to talk or communicate in their preferred method, are listened to and are safe. Adults in our schools take all welfare concerns seriously and whenever possible encourage children and young people to talk about anything that worries them. Concerns about a child must be shared with the Designated Safeguarding Lead. Safeguarding and promoting the welfare of children is everyone's responsibility. No single practitioner can have a full picture of a child's needs, so everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

We recognise that our staff play a vital role as they can identify concerns early and help solve problems before they develop. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

It should be remembered that, due to their learning disabilities and/or language barriers, children may not know how to tell someone that they are

being abused, exploited, or neglected, or they may not recognise their experiences as being harmful. They may not feel ready or be able to articulate abuse. It is therefore essential that staff build trusted relationships with children to facilitate communication. Any changes in a child should be reported on CPOMS (our safeguarding platform). Staff must have curiosity and speak to the DSL if they have any concerns about a child. All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, respond to a disclosure from a child and record and report this information. We will not make promises to any child to keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose, knowing their concerns will be treated seriously and that they can safely express their views.

Children at The Elm Court Livity Federation are taught how to keep themselves and others safe, including online. We present this information in an appropriate way recognising that all our pupils have special educational needs. We are sensitive to individual children's specific needs and vulnerabilities. It is important to listen carefully to the child, reflecting back, using the child's language (or preferred method of communication), being non-judgemental, being clear about boundaries and recording facts as the child presents them. See section 6: Procedures for managing concerns.

We will work in partnership to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2026) and the Lambeth Safeguarding Children Partnership.

All staff at The Elm Court Livity Federation should be aware of the process for community-based Family Help (also known as Early Help). Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

All staff should be particularly alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs including cognitive understanding
- Has special educational needs (all our pupils have an education, health and care plan)
- Has a mental health need
- Is a young carer
- Is persistently absent from education, including persistent absences for part of the school day
- Has experienced multiple suspensions, is at risk of being permanently excluded from school
- Is in an Alternative Provision or a Pupil Referral Unit
- Is frequently missing/goes missing from education, home or care

- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Is at risk of 'honour'-based abuse such as female genital mutilation or forced marriage
- Are looked after or previously looked after
- Is a privately fostered child
- Has returned home to their family from care
- Is showing early signs of abuse, neglect and exploitation
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality
- Has English as an additional language (EAL)
- Are asylum seekers

3. Roles and Responsibilities

Local Authority Contacts		
Local Authority Designated Officer (LADO): Matthew Nyakuhwa/Edward Snelgar Telephone: 02079264679/07720828700 Email: lado@lambeth.gov.uk		
Senior Safeguarding Manager (Early Years, primary schools, secondary schools and colleges): Deborah Carter Telephone: 07596955299 Email: dcarter@lambeth.gov.uk		
Lambeth Integrated Referral Hub: 02079263100 Out of hours: 02079261000		
Education Prevent Officer: Lydia Nixon Telephone: 0207 926 3668 Email: lnixon@lambeth.gov.uk		
Head of Inclusion, Education and Learning: Stuart Boffin Telephone: 0207 926 0296 Email: sboffin@lambeth.gov.uk		
CSE Co-ordinator Children's Services: Claire McDonald Telephone: 0207 926 0296 Email: CMcDonald@lambeth.gov.uk		
Role at Elm Court School	Name	Contact details
Designated Safeguarding Lead (DSL)	Nilgun Salih	salih.n@elmcourt.lambeth.sch.uk
Mental Health Lead	Nilgun Salih	salih.n@elmcourt.lambeth.sch.uk

Deputy DSLs	Joanna Tarrant Shaun Dodds Yusif Assim Alejandro Alonso	tarrant.j@elmcourt.lambeth.sch.uk dodds.sl@elmcourt.lambeth.sch.uk assim.y@elmcourt.lambeth.sch.uk alonso.a@elmcourt.lambeth.sch.uk
Designated Teacher for Children Looked After	Alejandro Alonso	alonso.a@elmcourt.lambeth.sch.uk
Role at The Livity School	Name	Contact details
Designated Safeguarding Lead (DSL)	Jocelyn Campbell	jcampbell@thelivity.lambeth.sch.uk
Mental Health Lead	Sam Battersby	sbattersby@thelivity.lambeth.sch.uk
Deputy DSLs	Joanna Tarrant Ivan Luptak Alberta Wilson Sam Battersby Shaun Dodds Melody Hadjipetrou	tarrant.j@elmcourt.lambeth.sch.uk iluptak@thelivity.lambeth.sch.uk awilson@thelivity.lambeth.sch.uk sbattersby@thelivity.lambeth.sch.uk dodds.sl@elmcourt.lambeth.sch.uk mhadjipetrou@thelivity.lambeth.sch.uk
Designated Teacher for Children Looked After	Sam Battersby	sbattersby@thelivity.lambeth.sch.uk
Federation Role	Name	Contact details
Executive Headteacher	Joanna Tarrant	tarrant.j@elmcourt.lambeth.sch.uk
Named Safeguarding Governor	Michael Jenner Euan Sutherland	michael_c_jenner@outlook.com euan@richardandean.com
Chair of Governors	Michael Jenner	michael_c_jenner@outlook.com

3.1 The Governing Board

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

The Governing Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with local authority guidance and the requirements of the Lambeth Safeguarding Children Partnership policies and procedures
- The schools contribute to inter-agency working in line with Working Together to Safeguard Children
- A senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL)
- There will always be cover for this role
- The role will be evidenced explicitly in the role holder's job description
- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the schools' safeguarding response for those pupils who go missing from education
- All staff undertake appropriate child protection training that is updated annually, this includes online safety training
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance
- Safer recruitment practices are followed by the requirements of [Keeping Children Safe in Education](#) DfE (2026)

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

3.2 The Headteacher

At Elm Court Livity Federation the Headteacher is responsible for:

- Identifying senior staff members from each school, to be the Designated Safeguarding Lead (DSL) and Deputies (DDSL)
- Ensuring that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are followed by all staff
- Ensuring all staff and volunteers can raise concerns about poor or unsafe practices. Such problems are addressed sensitively by the whistle-blowing procedures
- Liaise with the LADO in the event of an allegation of abuse against a staff member or volunteer

3.3 The Designated Safeguarding Lead (DSL)

Each school has a Designated Safeguarding Lead and they are responsible for safeguarding and child protection. The critical role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school
- Work with external agencies and professionals on matters of safety and safeguarding
- Undertake training
- Raise awareness of safeguarding and child protection amongst the staff and parents
- Ensure that child protection information is transferred to the pupil's new school if they leave
- Be aware of pupils who have a social worker
- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff
- The DSL will carry out their role and responsibilities as outlined in Annex C of [Keeping Children Safe in Education](#) DfE (2026)

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

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

The DSL, or deputy DSL, will represent our school at child protection conferences and core group meetings. Through appropriate training, knowledge and experience, our DSL will liaise with Children's Services and other agencies where necessary, make referrals of suspected abuse to Children's Services, participate in strategy discussions and other interagency meetings and contribute to the assessment of children. The DSL will maintain records and child protection files, ensuring they are kept confidential and stored securely (see section 8 for more information).

The DSL(s) will work with the Headteacher and senior leaders, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing or have experienced. They will identify the impact that these issues might be having on their attendance, engagement and achievement (see section 8). We will maintain a high aspiration culture for this cohort and ensure teaching staff provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.

4. Training & Induction

The critical training elements are:

Induction Training – this is mandatory and should include:

- The Safeguarding and Child Protection Policy
- The Behaviour Policy
- Code of Conduct
- The Safeguarding Response to Children who go Missing from Education (see section 7.11)
- The role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
- KCSIE 2026
- Online Safety (including an understanding of the expectations, applicable roles and responsibilities around filtering and monitoring)
- Supporting pupils with Medical Conditions and Allergies Policy
- Restrictive Interventions and the Use of Reasonable Force Policy
- Hydrotherapy Pool Policy (The Livity School only)
- Allergy Safety Policy

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

All other staff receive regular safeguarding and child protection updates as required, but have specific training at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Members of the Governing Board of the schools take part in mandatory safeguarding training (See KCSIE 2026, paragraph 81).

Opportunities to Teach Safeguarding

At the Elm Court Livity Federation we ensure that children are taught about how to keep themselves and others safe, including online. We recognise that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).

At Elm Court School all relevant topics will be included within Relationships, Sex and Health Education (for all secondary pupils).

At The Livity School all relevant topics will be included within Relationships Education (for all primary pupils).

At both schools we know that we play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

At the Elm Court Livity Federation we have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the behaviour policy and inclusion support system, as well as by a planned programme of evidence based regular timetabled lessons and reinforced throughout the whole curriculum.

At the Elm Court Livity Federation we will tackle, at an age-appropriate stage, issues such as:

- Supporting children to develop the skills that form the building blocks of all positive relationships
- Healthy and respectful relationships
- Boundaries, consent and kindness in relationships
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- What constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it
- Understanding online harms such as sharing images, the prevalence of deep fakes, pornography and misogynistic influencers and when and where to seek help

5. Filtering and Monitoring Systems

All staff will receive online safety training. They will be made aware of online safety expectations, applicable roles and responsibilities in relation to filtering and monitoring. They will understand their role within this process.

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

The Headteacher will need to ensure that online safety training is included in the staff safeguarding and child protection training.

The Elm Court Livity Federation reviews the effectiveness of their online safety systems at least once every academic year. These reviews are carried out by the senior leader responsible for filtering and monitoring, with support from the DSL and IT services. Records of these reviews are kept on file.

6. Procedures for Managing Concerns

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

All staff are encouraged to report their concerns and not see these as insignificant. Abuse may be evidenced by building up a picture over time. This is

particularly true in cases of emotional abuse, neglect and exploitation. It is crucial that staff record and pass on concerns immediately to allow the DSL to identify any patterns and access support for the child at the earliest opportunity. Reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

School staff are not responsible for investigating welfare concerns or determining the truth of any disclosure or allegation. All staff however have a duty to recognise potential problems and inform the DSL with the information as outlined in this policy. When reporting concerns, staff should maintain confidentiality by only involving those who need to be involved.

The Designated Safeguarding Lead (DSL) should be the first point of contact for concerns and queries regarding safeguarding concerns in our school. Any staff member or visitor to the schools who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior staff member.

All concerns about a child or young person should be reported without delay and recorded in writing using CPOMS, our agreed safeguarding system. Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Lambeth Integrated Referral Hub as required. All information and activities taken, including the reasons for any decisions made, will be fully documented. All referrals will be made in line with Lambeth Children's Services procedures.

If there is a risk of immediate serious harm to a child, a referral should be made to Lambeth Integrated Referral Hub and/or the police immediately. Anybody can make a referral in these circumstances. If the child's situation does not appear to improve, the staff member with concerns should press for re-consideration by raising concerns with the DSL and Headteacher.

Any member of staff who does not feel that concerns about a child have been responded to appropriately or if the child's situation does not appear to improve, should firstly raise the issue with the DSL and Headteacher. If any member of staff continues to feel the situation has not been addressed appropriately, they should alert the Chair of the Governing Board. If they are still unhappy with the response at this point, they should contact Lambeth Children Services directly with their concerns.

All staff should have a 'professional curiosity' and speak to the DSL if they have concerns about a child.

7. Specific Safeguarding Issues

7.1 Contextual Safeguarding

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

7.2 Child Sexual Exploitation (CSE)

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document [*Child sexual exploitation: Definition and a guide for practitioners* \(DfE 2017\)](#).

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

Indicators of child sexual exploitation may include:

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

7.3 Child Criminal Exploitation (CCE)

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

The victim may have been criminally exploited even if the activity appears consensual.

Some of the following can be indicators of CCE:

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

7.4 County Lines and Serious Violence

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

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

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

At the Elm Court Livity Federation, we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. The key to identifying potential involvement in county lines is missing episodes when the victim may have been trafficked to transport drugs. All staff should be aware of children who:

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

We understand that children trapped in this exploitation may be forced into carrying weapons such as knives in an attempt at protecting themselves from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

If a child is suspected to be at risk of or involved in county lines a referral to the Lambeth Integrated Referral Hub will be made alongside support to access local services/third sector providers who offer support to victims of county lines exploitation.

Serious Violence

The Elm Court Livity Federation understands that serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan and where relevant, consider action to de-escalate peer conflict. If appropriate the matter will be reported to the police.

The Elm Court Livity Federation recognises that we play a key role in protecting pupils from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. These pupils will have access to trusted adults, social and emotional skill support and targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) and the 'what works' centre for preventing violence). If a child is suspected to be at risk of or involved in county lines or serious violence, a referral to the Lambeth Integrated Referral Hub will be made.

7.5 Domestic Abuse

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

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

People are 'personally connected' when they have been married to each other or civil partners or have agreed to marry or become civil partners or if the two

people have been in an intimate relationship with shared parental responsibility for the same child or are relatives.

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background. Domestic abuse can occur inside or outside the home.

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

Operation Encompass

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate). Operation Encompass is also an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales.

In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident and situations where a child might reside in another household temporarily or permanently. The Elm Court Livity Federation is a part of the scheme and receive alerts from the police if DV is reported.

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

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

Female Genital Mutilation

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically occurs between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from relationships education/PSHE
- Visiting female elders from the country of origin
- Being taken on an extended holiday to the country of origin
- Talk about a 'special' procedure to become a woman

FGM may be likely if there is a visiting female elder, there is talk of a particular procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an 'at-risk' country (especially before the Summer holidays) or parents want to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

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

Our staff are well placed to identify concerns and to act to prevent children from becoming victims of female genital mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV). We provide guidance on these issues through our safeguarding training. If staff have a concern regarding a pupil being at risk of HBV they should inform the DSL, who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

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

Forced marriage

At the Elm Court Livity Federation we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties where violence, threats or

any other form of coercion is used to cause a person to enter the marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. We recognise that we can play an important role in safeguarding children from forced marriage. Threats can be physical or emotional or psychological.

The [Forced Marriage Unit \(FMU\) has created: Multi-agency practice guidelines:](#) handling cases of forced marriage (pages 75-80 of which focus on the role of schools) and multi-agency statutory guidance for dealing with forced marriage, which can both be found at The Right to Choose: Government Guidance on Forced Marriage - GOV.UK (www.gov.uk) Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

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

7.7 Preventing radicalisation and extremism

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

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

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

The Designated Safeguarding Lead has received training about the Prevent Duty and 'the need to prevent people from becoming involved with or supporting terrorism' and can support staff with any concerns they may have.

We use the curriculum (when appropriate due to our children's level of cognition) to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, indicating that they may need help or protection. Staff should use their judgement to identify children at risk of radicalisation and act proportionately. For information, refer to the DfE's guidance on [managing risk of radicalisation in your education setting](#)

We are committed to ensuring that our pupils are offered a broad and balanced curriculum to prepare them for life in modern Britain. Teaching the school's core

values alongside the fundamental British Values supports quality teaching and learning.

7.8 Recognising Extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages like illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also compelling narratives, programmes networks that young people can come across online, so involvement with groups may not be apparent)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race, or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

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

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

7.9 Child-on-child abuse (now includes sexual violence and sexual harassment)

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

- Staff recognising, acknowledging, and understanding the scale of harmful sexualised behaviour (HSB), sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- Recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence
- Challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them
- Taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual

All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

At the Elm Court Livity Federation we recognise that all child-on-child abuse is unacceptable and will be taken seriously. All staff are trained so that they are aware that safeguarding issues can manifest themselves via child-on-child abuse and sexual violence. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing bodily harm
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour, sexual violence and sexual harassment which may include misogyny/misandry
- Up skirting
- Consensual and non-consensual making or sharing of nudes and semi-nude images/and videos, including those generated by AI. The federation take incidences seriously and follow the guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people.](#)
- Causing someone to engage in sexual activity without consent
- Initiation/ hazing type violence and rituals

We recognise that children can be vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that by an adult. We understand that abuse can occur in intimate personal relationships between young people (also known as teenage relationship abuse). We know that for some (but not all) forms of child-on-child abuse it is more likely that girls will be the victims and boys the perpetrators.

We actively follow procedures to minimise the risk of child-on-child abuse by delivering regular training for staff enabling them to identify and challenge inappropriate behaviours. We tackle issues directly with children through curriculum programmes because we believe it is important to teach children to understand their right to be treated with respect in a relationship and how they should treat others with the same dignity and respect. We create a safe and nurturing environment through establishing trusting relationships between staff and children. We ensure there is sufficient supervision and monitoring of potential 'hotspots' such as playtimes and transition times.

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

If a child reports abuse to a staff member, they will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The DSL will respond to any problems related to child-on-child abuse in line with the guidance outlined in Part five of *'Keeping Children Safe in Education (2026)'*. We will ensure that all concerns, discussions and decisions are recorded. Any identified actions will be followed up with relevant agencies, including Police and Social Care, to respond to sexual violence and harassment concerns. If there are concerns or worries about developmentally inappropriate or harmful sexual behaviour, advice will be sought from the Harmful Sexual Behaviour (HSB) Team.

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

7.10 Modern Slavery

At The Elm Court Livity Federation, we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer

to the DfE guidance on [Modern slavery: how to identify and support victims](#) for concerns of this nature.

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

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to pupils and children who have unexplainable and/or persistent absences from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:

- Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns
- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)

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

- An attendance register is taken at the start of the of each school day and again after lunch in the afternoon
- Every effort is made to contact parents and carers and follow up with emergency contacts
- We hold at least two emergency contact numbers for each pupil on our roll wherever possible
- Staff will alert the DSL to any concerns regarding children absent from school
- The DSL will meet regularly with the Attendance Lead and other Inclusion Team members to ensure that each response is thorough and considers all the relevant information about individual children
- We will follow the procedures outlined in our attendance policy, including undertaking first-day calling and monitoring data to ensure we intervene early in cases of poor attendance or unexplained absences
- We address poor or irregular attendance through daily phone calls home and an attendance panel meeting held with parents and carers
- We will refer poor attendance to the LA

- We investigate any unexplained absences as part of our wider safeguarding duty absences and report to MASH if there are any safeguarding concerns
- We only remove children from the roll at non-statutory points when this has been agreed with the relevant LA due to our pupils all having EHCPs and pass on all safeguarding files

The Attendance Officer works closely with the Inclusion Team to identify reasons for school absence. Home visits are conducted in liaison with our Safer Schools Community Team where necessary.

7.12 Mental Health

All staff at The Elm Court Livity Federation know that mental health problems can, in some cases, indicate that a child has suffered or is at risk of abuse, neglect or exploitation. Our staff are well placed to observe children daily and identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action needs to be taken by speaking to the DSL, a deputy or the Mental Health Lead. Relevant concerns are recorded electronically and accurately and the information is shared with parent and carers and relevant agencies if needed. Referrals are made to external professionals and the situation is monitored.

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

Staff should make use of support from their respective mental health support team (MHST). The MHSTs are being rolled out to all schools and colleges in the Borough.

7.13 Online Safety and the use of mobile technology

At The Elm Court Livity Federation, we manage this risk in school by:

- Protecting pupils from inappropriate content when they access the internet, by our filtering and monitoring systems which are regularly reviewed for their effectiveness
- Staff must lock their personal mobile phones or personal cameras in their lockers and are only allowed to use them in the staff rooms or outside of the front door, when pupils are not present
- Pupils' mobile phones are handed in on entry to school and then locked away securely and given back at the end of the day

- Pupils do not have access to their mobile phones at any point during the school day including during lessons, transitions, break and lunchtimes
- Further information can be found in the document [mobile-phones-in-schools](#)

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

As part of the requirement for staff to undergo regularly updated safeguarding training, online safety training is also delivered. We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the DSL and any parental engagement.

At The Elm Court Livity Federation, we recognise that technology and online safety is considerable and ever evolving, and can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

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

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

7.14 Cybercrime

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

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - [ncsc.gov.uk](https://www.ncsc.gov.uk)

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

7.15 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

The Elm Court Livity Federation recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. Guidance around safety considerations and legal responsibilities can be found in the document [Generative artificial intelligence in education](#).

AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

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

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

Assessing adult-involved nude and semi-nude sharing incidents

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

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences including procedures for handling both consensual and non-consensual making and sharing of nudes and semi-nudes, including those generated using AI and must immediately be referred to police/social care.

However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually and financially motivated incidents

In this type of incident, an adult offender obtains nude and semi-nude images directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves, or they may use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share a nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

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

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

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

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

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

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

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering. Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

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

At The Elm Court Livity Federation we recognise children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in the group including -

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

At The Elm Court Livity Federation, we provide targeted support for pupils in liaison with Speech & Language Therapists (SaLT), Occupational Therapists (OT) and other therapists. We work to address each pupil's additional challenges along with ensuring appropriate communication support is in place.

At The Elm Court Livity Federation, we also recognise that pupils who attend Alternative Provision will often have complex needs and due to this, we are aware of the additional risk of harm these children may be vulnerable to.

Further information can be found in the department's [**SEND Code of Practice 0 to 25 years**](#)

Also, from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.
- The Council for Disabled Children
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

7.17 Supporting Pupils at School with Medical Conditions and Allergies

Keeping Children Safe in Education (KCSIE) 2026, have now highlighted that schools have a fundamental legal duty to safeguard children's welfare, which encompasses protecting them from severe allergic reactions. Following extensive campaigning, robust Allergy Safety in Schools Statutory Guidance (referred to as 'Benedict's Law') stringent safety procedures are now in place.

The Elm Court Livity Federation has an Allergy Safety Policy and because severe allergies (anaphylaxis) can be life-threatening, schools must treat them with the same seriousness as other physical safety and medical risks.

At The Elm Court Livity Federation the DSL and the named Allergy Safety Senior Leader ensure medical protocols are strictly integrated into the schools' overarching safeguarding culture. All staff at The Elm Court Livity Federation undergo allergy training. This includes mandatory instructions on identifying the warning signs of an allergic reaction and knowing exactly who to contact in an emergency.

At The Elm Court Livity Federation we ensure that children with allergies are not excluded from school life, such as science experiments, cooking, or school trips, provided that robust, risk-assessed controls are followed.

From September 2026 all schools in England must ensure life-saving allergy pens are stocked under new statutory guidance announced by the Department for Education. Therefore, at The Elm Court Livity Federation we stock adrenaline auto-injectors for use in emergency situations.

We have a comprehensive documentation for supporting children with medical conditions, including Individual Healthcare Plans to record specific arrangements for individuals like an allergy management plan.

7.18 Private Fostering

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

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

Schools must report to the local authority where they know or suspect that a child is subject to a private fostering arrangement. School staff should notify the DSL when they become aware of private fostering arrangements. The DSL

will speak to the child's family to ensure they know their duty to inform the LA. The school itself must report fostering arrangements to the local authority.

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

7.19 Pupils with a social worker

Support before statutory intervention

Any child may benefit from support before statutory intervention, from universal services and community-based Early Help, or the targeted level of Family Help.

All staff at The Elm Court Livity Federation should be aware of:

- The process for community-based Family Help assessments
- The criteria, including the level of need, for when a case should be referred to Family Help support and services provided at Targeted Early Help Level (under sections 10 and 11 of the Children Act 2004)
- Statutory Services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)
- The criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
- Section 31 of the Children Act 1989 (care and supervision orders)
- Section 20 of the Children Act 1989 (duty to accommodate a child)
- Clear procedures and processes for cases relating to:
- The abuse, neglect, and exploitation of children
- Children managed within the youth secure estate

All staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about responding to unauthorised absence or missing education where there are known safeguarding risks.

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

7.20 Looked-after and previously looked-after children

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

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

We have appointed designated teachers, who are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teachers are appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teachers will:

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

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

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our anti-bullying policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

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

When supporting a gender questioning pupil, we will take a very careful approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

The Elm Court Livity Federation will provide separate toilets for boys and girls aged 8 and over. In addition, we have a selection of self-contained individual toilets.

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

For older children, some sports may need to be played in single sex groups to ensure children's safety e.g. due to differences in physical strength, stamina, or physique. Where there are no safety concerns, the Federation will consider any request a child makes regarding how they participate in sports in line with the best interests of the child, the impact on other children and the aim of creating a safe and inclusive environment for all.

7.22 Homelessness

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

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

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

The Children's Wellbeing and Schools Act (2026) places a new duty on local housing authorities in England to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents. The notification will enable staff to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes. Whilst any discussion with the local housing authority should be progressed as appropriate, this notification does not, and should not, replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

7.23 Restrictive Interventions and The Use of Reasonable Force

There may be limited circumstances when it is appropriate for staff in school to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children.

This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.

The decision on whether or not to use ‘reasonable force’ to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances. “Restrictive Interventions and the Use of Reasonable Force Policy” was introduced in April 2026.

When using ‘reasonable force’ in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, school should, in considering the risks carefully, recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 (see paragraphs 90-94). At The Elm Court Livity Federation we plan positive and proactive behaviour support, for instance through individual behaviour plans for more vulnerable children. Since April 2026, there has been a requirement for parents/carers to be informed of any restrictive intervention taking place. A member of the Senior Leadership Team will contact parents/carers if a child is involved in a restraint.

We believe that the adoption of a ‘no contact’ policy at a school can leave staff unable to fully support and protect the pupils. Behaviour support plans and pupil profiles support staff to consider and avoid triggers for behaviour that challenges as well as appropriate de-escalation strategies. Staff are Team Teach trained in de-escalation techniques and will only use physical intervention as a last resort. Further advice and information are provided in the Restrictive Interventions and Use of Reasonable Force Policy.

7.24 Young Carers

The Elm Court Livity Federation is aware of the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing.

Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

8. Records and Information Sharing

If staff are concerned about the welfare or safety of any child at our school, they will record their concern on our safeguarding platform C-POMs. Any concerns should be communicated directly to the DSL or deputies without delay. Any information recorded will be kept on this secure online platform. For children who have a social worker, they will also be stored in a separate named file, in a locked filing cabinet. These files will be the responsibility of the DSL. Child protection information will only be shared within a school based on the need to know the child’s interests and understand that it remains strictly confidential.

Child protection information will be kept up to date. Each concern logged will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored in the child's electronic and paper files.

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

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

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

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

9. Working with Parents & Carers

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

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

We are committed to positively, openly and honestly working with parents. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so to safeguard a child from harm.

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

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

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

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

10. Child Protection Conferences

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

Staff members may be asked to attend a child protection conference or core group meetings on behalf of the school regarding individual children. Usually, the person representing the school at these meetings will be the DSL. In any event, the person attending will need to have as much relevant up- to-date information about the child as possible; any staff member may be required to contribute to this process.

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

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

11. Managing Allegations Against Staff & Volunteers

Allegations or concerns about an adult working in the school, whether as a teacher, supply teacher or trainee and other staff, volunteers, or contractors (also see Appendix 2).

At The Elm Court Livity Federation, we recognise that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay. If she is not on site, ask the office to contact her immediately.

Any concerns about the Headteacher should go to the Chair of Governors, who can be contacted by email.

Concerns may come from various sources, for example, a suspicion, complaint, or disclosure made by a child, parent, or another adult within or outside the organisation.

The Headteacher must decide whether the concern is an allegation or low-level concern. The term 'low-level' situation does not mean it is insignificant if the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

11.1 Allegations

It is an allegation if the person has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

(*Person could be anyone working in the schools that provide education for children including supply teachers, volunteers and contractors.)

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

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

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

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Before contacting the LADO, the Headteacher should conduct basic enquiries in line with local procedures to establish the facts to help them determine any foundation for the allegation, being careful not to jeopardise any future police investigation.

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation.

If necessary, the DSL may make a referral to local authority children's social care

- Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative
- Based on an assessment of risk, we will consider alternatives such as:
- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to our partner school or other work for the Local Authority
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following

agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If The Elm Court Federation is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the federation will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the federation's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

- We will liaise with relevant parties, including the LADO, to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and or children's services, we recognise that the school will usually take the lead in investigating as we have direct access to any affected children and other school staff to collect the facts
- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome. We inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments

- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the federation, while we carry out the investigation
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports or allegations

If a report or allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the federation will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome

- A declaration on whether the information will be referred to in any future reference

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

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

Sharing low-level concerns

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

We will create this culture by:

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

- Daily safeguarding facts during morning meetings

Responding to low-level concerns

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

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

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

Staff should be encouraged and feel confident to self-refer, where for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others and on reflection, they believe they have behaved in such a way that they consider it falls below the expected professional standards.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Low-level concerns should be recorded in writing, including:

- Name* of individual sharing their concerns
- Details of the concern
- Context in which the concern arose
- Action taken

(* if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible)

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves' employment at the school

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

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

The records review might identify broader cultural issues in the school that enabled the behaviour. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

References

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

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

The Elm Court Livity Federation has a legal duty to refer to the Disclosure and Barring Service for anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of several listed offences and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. In that case, a referral will be made as soon as possible after the resignation or removal of the individual by advice from the LADO and HR. The school must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first.

11.3 Whistleblowing

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

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

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

Relevant Policies

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

- Staff Code of Conduct

- Equalities including LGBTQ+
- Managing Allegations Against Staff
- Anti-Bullying Policy
- Positive Behaviour Policy
- Recruitment & Selection (which adheres to Part 3 of Keeping Children Safe in Education 2026)
- Whistleblowing Policy
- Attendance Policy
- Online Safety Policy (including Filtering and Monitoring Process)
- Data Protection and GDPR
- Health and Safety, including site security
- Harassment and discrimination, including racial abuse
- First aid
- Educational visits, including overnight stays
- Relationships Education
- Working with Children with Autism
- Supporting pupils with medical condition & Allergies Policy
- Allergy Safety Policy
- Restrictive Intervention and the use of Reasonable Force Policy

12. Safer Recruitment

The Elm Court Livity Federation recruits potential applicants who have the skills and expertise to be a vital part of the whole school approach to safeguarding and create a culture that safeguards and promotes the welfare of children in the school. As part of this culture, it is important that we adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our school. A robust Single Central Record process is in place.

Shortlisted candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records; further information can be found on GOV.UK. This information should only be requested from applicants who have been shortlisted. The information should not be requested in the application form to decide who should be shortlisted. The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.

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

Examples of the information we may ask for includes copies of documents used to verify the successful candidate's identity, right to work and required qualifications are kept on their personnel file. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK

GDPR/DPA 2018 Article 10. To comply with the requirements of the Data Protection Act 2018, we may choose to retain a copy, this would be for a valid reason, and it will not be kept for longer than six months. When the information is destroyed the federation may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to. Schools do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record. Further information on handling DBS information can be found on GOV.UK.

Agency and third-party staff (supply staff)

When working with agencies and supply staff we must obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as we would otherwise perform on any individual who will be working at our schools (or who will be providing education on the schools' behalf, including through online delivery). We also ask for two references from previous employers and to see the enhanced DBS for our records. These documentations are received before the employee begins work at The Elm Court Livity Federation.

Contractors

When The Elm Court Livity Federation use contractors to provide services, we set out our safeguarding requirements in school. All contractors will require an enhanced DBS check (including children's barred list information).

Under no circumstances does a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. The Elm Court Livity Federation will be responsible for determining the appropriate level of supervision depending on the circumstances.

If an individual working at either school is self-employed, we carry out the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

The Elm Court Livity Federation has electronic photographic process of signing in and out of school. The Elm Court Livity Federation always checks the identity of contractors on arrival at one of the schools.

Visitors

All visitors must be known to the school before allowing them to enter. Visitors are expected to sign in and wear a visitor's badge.

Visitors will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or NHS, will provide prior written confirmation that an appropriate level of DBS check

has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors will be accompanied by a member of staff at all times.

We will not invite into school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Visitors must leave their belongings, including their mobile phone(s) in a locker or locked room during their visit.

Individuals volunteering in roles that involve teaching, training, instructing, or supervising children frequently, overnight, or for more than three days in a 30-day period will be classified as engaging in regulated activity. This means that all volunteers in these roles will need to undergo an enhanced DBS check with a Children's Barred List check. Previously, unpaid activities were not considered regulated activity if supervised by someone in a regulated role, but this exemption has been removed, meaning all such activities are now classified as regulated activity.

Alternative Provision

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

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

13. Statutory Framework

The following legislation and guidance have devised this policy:

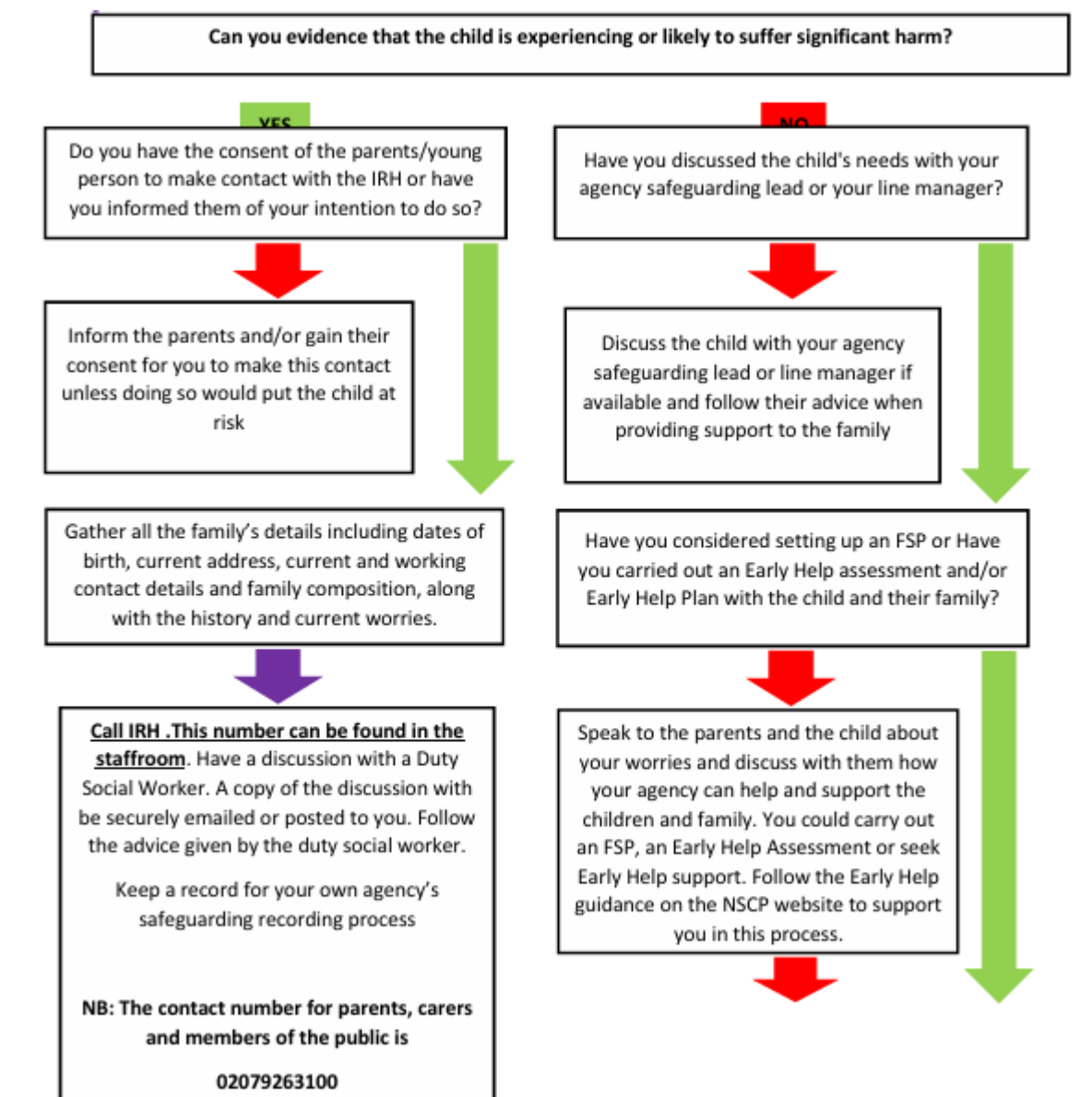
- [Keeping Children Safe in Education DfE \(2026\)](#)
- [Working Together to Safeguard Children DfE \(2026\)](#)
- [Education Act \(2002\)](#)
- [Guidance for Safer Recruitment- https://saferrecruitmentconsortium.org/Working Practices for Adults who work with Children and Young People in Education Settings](https://saferrecruitmentconsortium.org/Working Practices for Adults who work with Children and Young People in Education Settings) (May 2019)
- [The School Staffing \(England\) Regulations \(2009\)](#)
- [The Children Act 1989 \(and 2004 amendment\)](#)
- [What to do if you're worried a child is being abused DfE \(March 2015\)](#)
- [Information sharing: advice for practitioners providing safeguarding services DfE \(July 2018\)](#)
- [The Prevent duty: Statutory guidance for schools and childcare providers DfE \(June 2023\)](#)
- [Mandatory Reporting of Female Genital Mutilation- procedural information Home Office \(December 2015\)](#)
- [Statutory guidance on FGM](#)
- [Safeguarding Vulnerable Groups Act \(2006\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges DfE \(June 2021\)](#)
- [Teaching online safety in school DfE \(January 2023\)](#)
- [Mental Health and Behaviour in Schools DfE \(June 2026\)](#)
- [Data protection: a toolkit for schools DfE \(February 2023\)\)](#)
- [Promoting the education of children with a social worker \(June 2022\)](#)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2019\)](#)
- <https://www.lambethsaferchildren.org.uk>
- [The Human Rights Act 1998 and European Convention on Human Rights](#)
- [The Voyeurism \(Offences\) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019. 138Project DE SHAME from Child net provides useful research, advice and resources regarding online sexual harassment.](#)
- [The Equality Act 2010](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018 and Childcare Act 2006](#)
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

Approved by The Governing Body in September 2026

To be reviewed annually

Appendix A: Local Safeguarding Procedures

Integrated Referral Hub



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

[Links and guidance](#)

How to make a referral

1. First phone the LADO on [020 7926 4679](tel:02079264679) to discuss your potential referral and
2. Always email the LADO inbox to request a discussion should the call not be answered.
3. Should it be agreed a formal allegations referral form is required, please download the [Allegations Referral Form](#) and complete all the sections of the referral.
4. Email the completed form to LADO@lambeth.gov.uk and the Integrated Referral Hub on helpandprotection@lambeth.gov.uk
5. And phone [020 7926 4679](tel:02079264679) after approximately 10 minutes to speak with the LADO ensure it has been received in the LADO inbox.

Links

Lambeth Designated Officer:
Andrew Zachariades

[Call 020 7926 4679](tel:02079264679)

LADO@lambeth.gov.uk

[Download Allegations Referral Form](#)

Integrated Referral Hub

[Call 020 7926 3100](tel:02079263100)

helpandprotection@lambeth.gov.uk

Concerns about poor practice or management in a school or early years setting?

If you have a complaint or issue with poor safeguarding practice or management in a school or early years setting in Lambeth please email [Deborah Carter](mailto:Deborah.Carter@lambeth.gov.uk), Education Senior Safeguarding Manager, or DL_EducationSafeguarding@lambeth.gov.uk.

Appendix C:

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

