

Child Protection and Safeguarding Policy and Procedure

1. Introduction

“It could happen here.”

Kids Can Achieve (KCA) is part of the Learning Disability Network London (LDN London) and supports children and young adults with learning disabilities, autism, and other complex needs. Many of the children who use our services are particularly vulnerable to abuse and neglect.

We are registered with Ofsted under the Compulsory and Voluntary Childcare Registers and operate after-school, weekend, and holiday activities for children and young adults aged 5 to 25.

This policy sets out how we meet our responsibility to safeguard their welfare and applies to all LDN London staff, volunteers, trustees, contractors, agency workers, and students.

KCA is fully committed to protecting and safeguarding the welfare of all children and young adults who use our services. As a specialist provision for those with complex communication, learning, and behavioural needs, we recognise our vital role in identifying children at risk of abuse or neglect, especially when concerns may not be easily communicated, and securing the support they need.

Our Values and Children’s Rights

- At KCA we believe that all children and young adults have the right to:
- Be safe, protected, and treated with dignity and respect.
- Have their voices heard and taken seriously in decisions that affect them.
- Grow up in an environment that nurtures their wellbeing, learning, and development.

We are committed to ensuring that children’s rights are upheld in every aspect of our work, and that our values of respect, inclusion, accountability, and partnership guide the way we support children, families, and communities.

Purpose of this Policy:

1. Protect children and young adults who use our services
2. Define abuse, outline its potential signs, and describe the procedures for reporting concerns
3. Provide access to relevant statutory guidance and supporting information

We will achieve this by fully implementing the Child Protection and Safeguarding Policy and ensuring that all staff and volunteers follow the procedures outlined. All staff must read the relevant statutory guidance and sign to confirm that they understand their safeguarding roles and responsibilities.

In accordance with statutory guidance, Working Together to Safeguard Children 2023, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners

have equal and joint duty for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements.

LDN London staff at KCA must work in accordance with the multi-agency procedures developed by the local Safeguarding Children's Board which can be found on their website:

<https://harrowsafeguarding.org.uk/>

2. What is Safeguarding?

Safeguarding children and young adults is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play.

At KCA, we operate a child-centred, coordinated approach to safeguarding. We work collaboratively with children, parents, professionals, and the wider community to ensure the safety, rights, and wellbeing of every child. No single practitioner can have a complete picture of a child's needs and circumstances, so effective partnership working is essential.

Child protection is a core component of safeguarding and refers to the activities undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential to our wider safeguarding duties.

We follow the definition of safeguarding from *Keeping Children Safe in Education (KCSIE) 2025*:

1. Protecting children from maltreatment
2. Preventing impairment of children's mental and physical health or development
3. Ensuring children grow up in circumstances consistent with the provision of safe and effective care
4. Taking action to enable all children to have the best outcomes

It may be difficult to accept, but every child, regardless of age, gender, religion, ethnicity, or disability can be hurt, placed at risk of harm, or abused.

Staff Roles and Responsibilities

All staff must:

- Be aware of safeguarding issues that can put children at risk of harm
- Provide a safe and supportive environment in which children can thrive
- Be prepared to identify children who may benefit from early help
- Follow the organisation's referral processes for any concerns about a child's welfare
- Understand safeguarding systems and procedures, as outlined during induction
- Know what to do if a child discloses abuse or neglect
- Never promise confidentiality when a disclosure indicates potential harm



Staff Behaviour and Conduct

All adults working with KCA are expected to maintain the highest standards of professional behaviour, in line with our values and safeguarding responsibilities. This includes:

- Acting as positive role models for children and young adults.
- Maintaining professional boundaries at all times.
- Never using degrading, humiliating, or abusive language or behaviour.
- Treating all children fairly and without favouritism.
- Using only KCA-approved systems for communication, record keeping, and image capture.
- Challenging unsafe or inappropriate behaviour by colleagues, visitors, or other adults.
- Reporting any concern, no matter how small, to the DSL.

These expectations apply both during work and outside work, where conduct may impact professional responsibilities or the reputation of KCA. Breaches will be taken seriously and may result in disciplinary action.

The Staff Handbook clearly sets out where to access policies on:

1. Child Protection
2. Behaviour
3. Staff Behaviour / Code of Conduct
4. The Role of the Designated Safeguarding Lead (DSL)

Legal Safeguarding Duties

Under the Children Act 1989 and 2004, all KCA staff, volunteers, trustees and agency workers have a legal obligation to report any child abuse they witness, suspect, or are informed about. This applies across all KCA settings, including building-based activities, in-home visits, and community-based services.

Staff must be able to identify children who may benefit from early help, and concerns about a child's welfare must be reported in line with organisational procedures. All staff are also expected to fully cooperate with any investigations that may arise.

KCA's Approach to Safeguarding

KCA is committed to reducing the risk of harm and increasing the detection of safeguarding concerns through:

1. Robust recruitment practices, including pre-employment checks (e.g. references, right to work, DBS, fitness for work, and clarification of employment gaps)
2. Values-based selection and ongoing monitoring of staff and volunteers
3. Regular safeguarding training and awareness-raising across the organisation
4. Comprehensive policies and procedures that reflect current law, best practice, and KCA's values
5. Effective multi-agency working
6. Additional pastoral support for children and young adults with SEND

Disabled Children and Risk of Abuse

According to *Safeguarding Disabled Children: Practice Guidance* (DCSF, 2009), disabled children are approximately:

- 3.8 times more likely to be neglected
- 3.8 times more likely to experience physical abuse
- 3.1 times more likely to suffer emotional abuse

These figures underline the importance of vigilance in our work.

Responding to Abuse

When abuse is suspected, KCA will act in ways that are:

- **Prompt** – especially when a child’s health, wellbeing, or safety may be at immediate risk
- **Sensitive** – to the needs of children, young adults, and their families
- **Effective** – in reporting, communication, and developing solutions to reduce risk and prevent recurrence
- **Balanced** – avoiding unnecessary intervention while fulfilling legal and ethical responsibilities
- **Inclusive** – ensuring no discrimination based on religion, culture, age, disability, gender, race, or sexuality

We also support access to statutory guidance, including:

- Working Together to Safeguard Children (HM Government, 2023)
- What to Do If You’re Worried a Child is Being Abused – Advice for Practitioners (DfE, 2015)
- Keeping Children Safe in Education (DfE, 2025)

KCA will also ensure that staff remain aware of, and responsive to, any new or updated national safeguarding guidance issued by government or statutory partners.

Definition of Abuse

Abuse, neglect, and safeguarding issues are rarely isolated. Children often experience more than one form of abuse, and it frequently happens over time. If staff are unsure, they must consult a senior team member or the Designated Safeguarding Lead.

Abuse is a form of maltreatment that can be physical, emotional, sexual, or through neglect. It may involve direct harm or a failure to act to prevent harm.

Children may be abused by:

- Family members
- Friends
- Professionals or volunteers
- Others known to them
- Or, less commonly, by strangers

Abuse may also occur online or be facilitated by technology.

Neglect is the persistent failure to meet a child's basic physical and emotional needs, potentially causing serious harm to their health or development.

Getting Help and Reporting Concerns

Staff can contact the **NSPCC** for advice or to raise concerns:

-  **0808 800 5000** – Monday to Friday, 8am–10pm; weekends, 9am–6pm
-  **help@nspcc.org.uk** – available outside those hours
- Reports can be made anonymously
- If a child is at immediate risk, always call **999**

The **Harrow Voluntary Sector** provides further local guidance in the *Green Book*, available at: <https://www.harrowscb.co.uk>

Engaging Children, Parents, and Families in Safeguarding

Safeguarding is most effective when children, young adults, and families are active partners in shaping how we work. KCA promotes a culture of openness and collaboration by:

- Encouraging children and young adults to share their views on what makes them feel safe, using communication methods that suit their needs.
- Providing families with clear information about safeguarding procedures and who to contact if they are worried.
- Inviting feedback from families through meetings, surveys, and consultations, and acting on what they tell us.
- Ensuring children, young adults, and parents are included in reviews of safeguarding practice and policy updates, where appropriate.
- Offering accessible information (easy read, translated materials, visuals) to make sure all families understand their rights and our responsibilities.

This partnership approach helps build trust, ensures children's voices are central, and strengthens the safeguarding culture across KCA.

3.Statement on Safeguarding Children with Special Educational Needs and Disabilities (SEND)

Under Section 17 of the Children Act 1989, any child with a disability is classed as a *child in need*. Research and practice show that disabled children are significantly more vulnerable to abuse and neglect than their non-disabled peers.

Safeguards for disabled children must be applied with the same vigilance and urgency as for any child. However, particular attention is needed to:

- Raise awareness of the additional risks faced by children with SEND
- Ensure high standards of safeguarding practice, including making reasonable adjustments
- Address barriers to communication, ensuring children can express concerns in ways that suit them

KCA recognises that additional safeguarding challenges exist for children with SEND. These include:

1. Assumptions that behaviour, mood, or injury are related to the child's disability, without proper investigation
2. Higher risk of social isolation from peers
3. Being disproportionately affected by bullying, without showing outward signs
4. Barriers to effective communication, including limited access to adapted reporting methods
5. Dependence on adults for intimate or personal care, increasing vulnerability

Where concerns arise about the welfare of a child with SEND, they must be addressed promptly and in accordance with this policy, *without delay or lower thresholds*.

KCA ensures that:

- Safeguarding strategies and communications are inclusive of all children, regardless of need
- Staff are trained to use alternative communication methods (e.g. visual aids, Makaton, symbols)
- The voices of children with SEND are actively sought, heard, and respected
- Multi-agency working is embedded in our safeguarding practice, following the SEND Code of Practice (2015)

In partnership with families and professionals, KCA teaches all children about their rights, safe relationships, and how to seek help using tools suited to their needs.

4. Safer Recruitment and Staff Training

LDN London is committed to creating a safe environment for children and young adults through safer recruitment, induction, training, and ongoing vigilance. All staff, volunteers, trustees, and anyone working in regulated activity are subject to robust recruitment and vetting procedures in line with Keeping Children Safe in Education (KCSIE) 2025 and Safer Recruitment Guidance.

Safer Recruitment Practices

We follow the national safer recruitment standards, which include:

1. Enhanced DBS checks, including Barred List checks, for all individuals working in regulated activity with children.
2. Verification of identity, right to work in the UK, and any professional qualifications.
3. Obtaining two references, with one from the most recent employer.
4. Exploration of any employment gaps, ensuring a clear employment history.
5. Online and social media screening where appropriate (in line with KCSIE 2025 recommendations).
6. Checks on individuals who have lived or worked overseas, including police checks where relevant.
7. Ongoing monitoring and renewal of checks during employment.

All job descriptions include safeguarding responsibilities, and all interview panels include at least one person trained in safer recruitment. Volunteers and agency staff also undergo the appropriate checks before beginning work.

Induction and Training

Each new member of staff is provided with this Child Protection and Safeguarding Policy at induction and is asked to sign a declaration to confirm they have read and understood it. Induction also includes immediate safeguarding training, including:

- The NSPCC introductory safeguarding training (mandatory before any work begins).
- Role of the Designated Safeguarding Lead.
- Whistleblowing procedures.
- Safe working practices.

Ongoing training requirements for all staff include:

1. Annual refresher safeguarding training.
2. Regular updates throughout the year, including learning from safeguarding incidents, legislation changes, or local authority alerts.
3. Supervision and management oversight to reinforce safeguarding standards.

We also refer to the NSPCC Safeguarding Standards as a key source of guidance and tools to enhance our safeguarding culture.

The Single Central Record (SCR)

LDN London maintains a Single Central Record (SCR) of all safer recruitment checks for employees, volunteers, trustees, and agency staff. This record is securely held on the Cintra HR system and is reviewed regularly by the safeguarding lead and HR.

As per KCSIE 2025 requirements, the SCR includes confirmation of the following checks:

1. Identity verification
2. Barred List check
3. Enhanced DBS certificate
4. Right to work in the UK
5. Qualifications (where applicable)
6. Overseas checks (for staff who have lived/worked abroad)

The SCR also notes the date each check was completed and who verified it. This centralised system enables effective oversight, audit readiness, and regulatory compliance with Ofsted requirements.

5. Designated Safeguarding Lead (DSL)

KCA has a named Designated Safeguarding Lead (DSL) who takes the lead in ensuring that effective and appropriate arrangements are in place to keep children and young adults safe. This includes promoting the safety and welfare of all children and young adults involved in KCA's activities at all times.

- **DSL:** Ilias Kostalas – Assistant Director, Children, Families & Communities
☎ 07739 627514 ✉ ikostalas@LDNLondon.org
- **Deputy DSL:** Charlie Minto – Children & Young Adults Deputy Manager
☎ 07415228423 ✉ cminto@LDNLondon.org

Safeguarding Cover: In case of long-term absence of the DSL and Deputy DSL, Mandy Crawford, Assistant CEO- Growth, Innovation and Transformation, will act as safeguarding lead to ensure continuity. ✉ mcrowford@LDNLondon.org

DSL Responsibilities

In line with *KCS/E 2025*, the DSL is a member of the senior leadership team and is leading on:

1. Developing, implementing, and regularly reviewing KCA's safeguarding and child protection policies and procedures.
2. Ensuring that all staff, volunteers, and trustees understand the safeguarding system, know what to do if they have a concern, and feel confident to raise it.
3. Being available during operational hours to support staff with any safeguarding concerns.
4. Ensuring that children, young adults, and families know how to raise concerns, and understand what action KCA will take.
5. Managing referrals to:
 - Local authority children's or adults' social care
 - The Channel programme
 - The Disclosure and Barring Service (DBS)
 - The police
6. Responding to safeguarding concerns, including those involving staff or volunteers, in line with internal procedures and statutory expectations.
7. Liaising with the Local Authority Designated Officer (LADO) for all allegations against staff or volunteers.
8. Maintaining confidential, accurate, and secure child protection records on CPOMS, and ensuring timely transfer when children leave the service.
9. Promoting educational progress and wellbeing for children and young adults who are vulnerable or at risk.
10. Attending and contributing to inter-agency strategy discussions, conferences, and planning meetings.
11. Keeping the Board of Trustees informed of safeguarding developments, serious incidents, and patterns of concern.
12. Contributing to a strong safeguarding culture across KCA through role modelling, support, and challenge.

Training and Continuous Professional Development

To fulfil these responsibilities, the DSL and Deputy DSL must:

- Complete formal DSL training at least every two years.
- Receive regular safeguarding updates (at least annually) to remain current with national and local practice.
- Attend the Harrow Voluntary & Community Sector Safeguarding Leads Forum to engage with the wider safeguarding network.
- Understand and use local referral pathways, including the Multi-Agency Assessment and Referral Form (MAARF).
- Be familiar with and contribute to child protection case conferences, core groups, and review meetings.
- Stay up to date on emerging safeguarding risks, such as online harm, exploitation, and vulnerabilities linked to SEND.

Responding to Concerns

The designated safeguarding lead or deputy should always be available to discuss safeguarding concerns. On-call support is provided in evenings during term time and during weekends. If in exceptional circumstances, the designated safeguarding lead or a deputy are not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead or deputy as soon as is practically possible.

When a concern is raised, the DSL (or their deputy/cover) will:

1. Listen carefully to the reporting staff member and gather relevant information.
2. Assess whether the threshold for referral is met, consulting with social care or safeguarding partners if needed.
3. Inform parents or carers where appropriate, unless this places the child at increased risk.
4. Make referrals without delay, ideally within 12 hours of the concern being raised.
5. Record all actions taken, including:
 - Dates and times
 - Content of discussions
 - Decisions made and rationale
 - Steps taken and referrals submitted

KCA aligns all safeguarding actions with the London Safeguarding Children Partnership procedures, ensuring our response is prompt, proportionate, and child centred

6. Reporting Suspected Child Abuse

All staff, volunteers, and trustees have a legal and moral duty to report any concern about the safety or welfare of a child or young adult. Safeguarding is everyone's responsibility, and staff must always act in the best interests of the child.

Staff should never assume someone else will take action. Early reporting and information sharing are vital to protect children and prevent escalation of harm.

When to Report

You must report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. If neither is available, contact the KCA On-Call Manager. Do not delay.

You must report if:

- You witness any form of abuse involving a child at KCA, at home, or in the community.
- A child discloses abuse or concerning behaviour to you.
- Another staff member, professional, or visitor raises a concern.
- You observe something worrying about a child or young person's welfare.
- You suspect abuse based on the Definitions of Abuse.

Never promise confidentiality. Always explain that information may need to be shared to keep the child safe.



Reporting Process

All safeguarding concerns must be:

1. Reported immediately to the DSL or Deputy DSL.
2. Escalated to emergency services (999) if there is an immediate danger to the child.
3. Recorded clearly, accurately, and promptly using KCA's CPOMS system or other designated safeguarding forms.

Records should include:

- A clear and comprehensive summary of the concern.
- Details of how it was followed up and resolved.
- A note of any actions taken, decisions made, and their rationale.

All records must be kept confidential and stored securely in line with data protection and safeguarding procedures.

Prompt Action Matters

Research and local safeguarding reviews show that failing to act early can lead to serious harm. Examples of poor safeguarding practice include:

- Ignoring early signs of abuse or neglect.
- Poor or absent recordkeeping.
- Failing to listen to children's voices.
- Delaying information sharing.
- Not reassessing ongoing concerns.
- Avoiding professional challenge where needed.

Failing to report concerns can:

- Leave a child at risk of continued harm.
- Prevent timely support or investigation.
- Allow perpetrators to remain unchallenged.
- Result in disciplinary action for staff.

Reporting concerns is mandatory under KCSIE 2025, and all staff must share any reasonable concern without delay, even if unsure abuse is occurring. Staff are expected to follow up to ensure appropriate action has been taken.

Whistleblowing

If you have concerns about the behaviour of a colleague, professional, or volunteer including potential abuse, unsafe conduct, or poor safeguarding practice, you must report it immediately.

You can raise your concern directly with:

- Brian Watts, Whistleblowing Officer, Director for People – ☎ 07960 435815
- Helen Evers, Director for Services, Quality & Practice– ☎ 07522 546 436
- ✉ Email: whistleblow@wspld.org

Alternatively, you can raise a concern using [the internal whistleblowing Cintra HR form](#):

For external, confidential support, staff may contact:

NSPCC Whistleblowing Helpline

☎ 0800 028 0285 (Monday–Friday, 8am–8pm)

✉ help@nspcc.org.uk

Responding When a Child Is in Immediate Danger

If a child is believed to be in immediate danger or at serious risk of harm, staff must take urgent action in the best interests of the child.

- Call 999 immediately to request police or emergency medical assistance, if required.
- Inform the On-Site Manager or On-Call Manager as soon as it is safe to do so.
- The Designated Safeguarding Lead (DSL) or Deputy DSL must be informed without delay.
- Staff must not wait for someone else to act or assume another professional will report the concern.

If a concern involves an adult within the service (e.g. a staff member, volunteer, or visitor), report the concern immediately to the On-Call Manager, who will inform the DSL. The Local Authority Designated Officer (LADO) may also need to be contacted.

If a child may be at risk upon leaving the setting, this must be escalated immediately to determine next steps, which may include contacting social care or the police.

All actions and decisions taken must be:

- Documented clearly and promptly (e.g. in CPOMS)
- Shared only with those who need to know
- Followed up to ensure a protective response has been implemented

KCA's Designated Safeguarding Lead (DSL) takes lead responsibility for managing referrals to external agencies. However, **any staff member** can make a referral to children's social care **if they believe a child is at immediate risk and the DSL is unavailable**.

7. Referrals and Allegations

The DSL (or Deputy DSL in their absence) will:

1. Refer all cases of suspected or actual abuse to the relevant Local Authority Children's Social Care immediately.
2. Contact the Local Authority Designated Officer (LADO) for all concerns involving a staff member, volunteer, or contractor (i.e. allegations of harm or risk to a child caused by a person in a position of trust).
3. Refer to the Disclosure and Barring Service (DBS) if a person is:
 - Dismissed or
 - Leaves their role due to risk of harm to a child.
4. Report to the Police if a crime may have been committed, including cases of sexual abuse or physical assault.

Referrals to the LADO, Police, or DBS will be made in a timely manner, following internal and statutory protocols.

Out-of-Hours Referrals:

- If a safeguarding concern arises outside of normal working hours (Mon to Fri, 9am to 5pm), staff must contact the KCA On-Call Manager immediately.
- The On-Call Manager will ensure appropriate actions are taken, including escalation to the DSL and external services.

Recording and Documentation:

All safeguarding concerns must be documented **factually and without delay** on **CPOMS (KCA's Child Protection Online Management System)**.

Records must include:

- What was seen, heard, or disclosed
- Who was involved
- The time, date, and location
- Any immediate actions taken

Avoid interpretation, speculation, or assumptions. Stick to objective information.

Records should also document:

- Discussions with other professionals
- Referral decisions and rationale
- Outcomes and follow-up actions

Well-kept records are essential to good child protection practice. They need to be detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. If in doubt about recording requirements, staff should discuss with the DSL or deputy DSL.



Allegations Involving a Member of the Child's Family

If an allegation is made against a member of a child's family, the onsite manager must immediately contact the relevant Local Authority Children's Social Care team for advice and next steps.

Until Children's Social Care provide direction:

- The child must not be released into the care of any individual.
- Staff must be prepared for the child to remain at the service beyond regular hours.
- This precaution protects the child from further harm or pressure from family members to remain silent.

Documentation and Multi-Agency Coordination:

- All records from the manager, concerned staff, or other witnesses must be stored in the child's file on CPOMS.
- Copies may be shared with: Local authority social care, health professionals, parents (only when appropriate and in consultation with social care)
- Staff may be required to attend strategy meetings or child protection conferences as part of the process.

It is important to recognise that allegations can be made against anyone: family members, professionals, volunteers, other children, or visitors.

Allegations Against a Member of Staff

LDN London recognises its duty of care to staff and its responsibility to ensure safe, fair, and proportionate handling of allegations.

If an allegation is made that a staff member:

- Has harmed a child
- May pose a risk to children
- Has behaved inappropriately in or outside of work

The following process will be followed in line with KCSIE 2025 and the Local Authority Designated Officer (LADO) procedures.

Initial Steps:

- Staff must report all allegations immediately to the DSL or senior manager.
- The DSL (or delegate) will contact the LADO without delay for guidance.
- If the allegation meets the threshold of harm, the LADO will lead on next steps.
- Low-level concerns must also be logged and reviewed.

Confidentiality & Support

The staff member will:

- Be informed of the allegation promptly.
- Be advised to contact their union or a colleague for support.
- Be given access to Employee Assistance Programme (for counselling and wellbeing support).

Confidentiality will be maintained in accordance with statutory guidance. Parents will only be informed once agreed by relevant professionals (e.g. police or social care), particularly in the case of a strategy discussion.



Suspension & Investigation

- Suspension may be considered if there is cause to prevent further risk to children or compromise to the investigation.
- Suspension is not automatic and must be assessed case by case in consultation with the DSL and Human Resources.
- Where appropriate, internal investigations will follow the KCA Disciplinary Procedure, but only once external safeguarding processes have concluded.

Outcome Definitions

Each allegation will result in one of the following outcomes:

- Substantiated – sufficient evidence to prove the allegation.
- Unsubstantiated – insufficient evidence to prove or disprove.
- Unfounded – no evidence or proper basis, may be false or mistaken.
- Malicious – clear evidence the allegation was made with intent to cause harm.
- False – the allegation is demonstrably untrue.

All actions, decisions, referrals, and outcomes will be recorded and stored securely on the and reviewed with oversight from the LADO and Human Resources.

Low-level concerns

KCA is committed to maintaining a culture of openness, trust, and professional accountability. All low-level concerns must be recorded and addressed appropriately. We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately

A low-level concern is any concern, no matter how small, that an adult working with children may have acted in a way that is inconsistent with the staff code of conduct and KCA values, but which does not meet the threshold of harm or warrant referral to the LADO.

The term 'low-level' concern does not mean that the concern is insignificant, it means that a staff member, supply teacher or volunteer does not seem to have: 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 or may have behaved in a way that indicates they may not be suitable to work with children.

A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, 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 over friendly with children; having favourites; taking photographs of children on a personal mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or humiliating, shouting at, or using derogatory behaviour towards children.

All low-level concerns should be reported to the DSL or a senior manager and recorded in writing using Cintra HR. Repeated low-level concerns may indicate a pattern of behaviour that requires further action. Records of such concerns are stored confidentially and reviewed

regularly by the DSL team and Human Resources to ensure transparency and uphold safeguarding standards.

8. Use of Mobile Phones and Cameras

At KCA we have strict protocols on the use of mobile phones and cameras.

Personal mobile phones and cameras must never be used to take photographs or recordings of children under any circumstances. This applies to all settings, including building-based sessions, family homes, and community-based activities.

Personal devices must be securely stored away during sessions. Staff, contractors, visitors and volunteers are not permitted to carry or access personal phones while working directly with children or the children's activity areas, unless expressly authorised for specific service-related purposes (e.g. lone working or emergencies).

Only KCA-issued devices may be used to capture images or recordings, and only by authorised staff. Any images must be: Taken with appropriate consent from parents or guardians. Stored securely on approved systems, with restricted access. Used solely for professional purposes, in line with service delivery and safeguarding expectations.

There are no circumstances that justify adults making, downloading, possessing, or distributing indecent images of children. Any such activity will be treated as a serious safeguarding and criminal matter and reported to the relevant authorities immediately.

This approach forms part of our duty to create a safe, respectful, and transparent working environment where children's rights, privacy, and wellbeing are fully protected.

9. Online Safety

Safeguarding children includes protecting them from online risks and abuse. Children may be exposed to harmful content, contact, or conduct online, including grooming, sexual abuse, exploitation, radicalisation, and bullying. Staff have a duty to help children use technology safely and build their digital resilience.

KCA is committed to promoting safe and responsible use of digital technology across all settings, building-based, in the home, and in the community. Whether children access the internet at KCA or elsewhere, we recognise our role in supporting their safety and wellbeing online.

Key measures include:

- Supervised internet use and content filtering on devices used in sessions.
- Staff training on online risks and procedures for reporting online harm.
- Parent/carer education via newsletters, workshops, and online resources.
- Age-appropriate education for children on online safety, privacy, and recognising unsafe behaviour.
- Acceptable use agreements for staff, volunteers, and children.
- Monitoring of digital communications and devices used for work purposes.

Any incident of online abuse or risk will be addressed in line with our safeguarding procedures. Staff must report any online safety concern (including harmful content or communications) to the DSL or Deputy DSL immediately and log it using CPOMS.

All use of digital media must comply with the Online Safety Policy and Data Protection Policy. Staff are not permitted to use personal devices to contact children or families, or to take or store any images or recordings. All images must be captured on KCA-approved devices, with consent and in line with our image use policy.

The Online Safety Lead ensures that online safeguarding is embedded in our broader child protection strategy, working in line with statutory guidance.

10. Confidentiality and Information Sharing

All staff must follow the principles of the Data Protection Act 2018 and UK GDPR to handle information securely, responsibly, and lawfully.

Safeguarding information must be shared strictly on a need-to-know basis, including with relevant professionals, to protect children from harm or promote their welfare.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must never be allowed to stand in the way of the need to safeguard and promote the welfare of children.

All staff must:

- Only share information internally when authorised by the Designated Safeguarding Lead (DSL) or their manager.
- Immediately report any safeguarding-related information to the DSL or relevant manager before making decisions or taking further action.
- Store all records securely in accordance with KCA’s Confidentiality Policy, Record Keeping Procedures, and national data protection laws.
- Use CPOMS for logging and storing safeguarding concerns.
- Never use personal devices, social media, or informal communication platforms (e.g. WhatsApp, Instagram) to engage with children or families.
- Staff, sessional workers, and volunteers must not befriend or communicate with children or young adults via personal social media accounts or messaging platforms.

Any breach of confidentiality protocols, including inappropriate information sharing or unauthorised contact with children, will be treated as a serious disciplinary matter

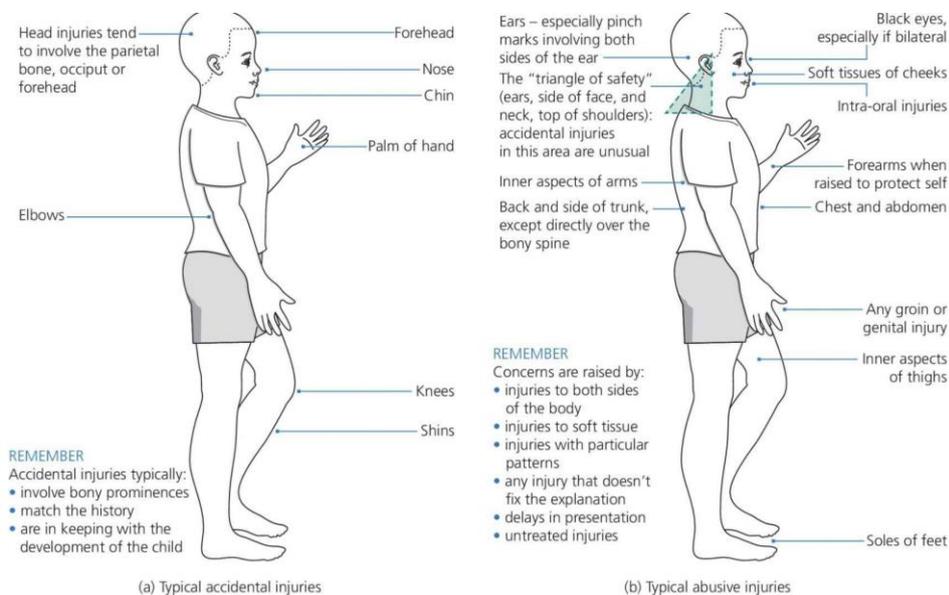
Review of policy or procedure

Date of last review	September 2025
Date of next review	September 2026
Author(s)	Assistant Director for Children, Families & Community
Audience	All employees (including employees transferred under TUPE)

Appendices

1. Definitions of abuse

When observing potential signs of abuse, it is essential that staff take into account each child's individual developmental profile, diagnosed needs, and communication style. Behaviours or expressions that may raise concerns in a child without disabilities could, in a child with SEND, reflect their medical condition, neurodivergence, or other support needs. While it is vital to remain open to the possibility that abuse or neglect may have occurred, staff must also avoid assuming that every concern is necessarily a safeguarding issue. A balanced approach rooted in professional curiosity and an understanding of each child's context.



a) Physical abuse

Definition: Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises, burns, and broken bones. It includes hitting, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. It also includes when a parent or carer fabricates or induces illness in a child.

Signs of Physical Abuse: All children may have accidental bruises and injuries. These often occur on bony areas such as knees, shins, or elbows. However, concerning signs include:

- Bruises on non-mobile babies
- Bruises on cheeks, ears, palms, arms, feet
- Bruises on back, buttocks, tummy, hips, and backs of legs
- Clusters of bruises, often on upper arms or outer thighs
- Bruises resembling handprints or objects (e.g. belts, shoes)
- Bite marks
- Burns with clear outlines (e.g. cigarettes)
- Burns on sensitive areas: back of hands, feet, legs, genitals, buttocks
- Multiple injuries at different healing stages

Frequent injuries, lack of explanation or inconsistent explanations, and delays in seeking medical attention are all red flags.

b) Neglect

Definition: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. It may impair their health or development and is the most common form of child abuse.



Types of Neglect:

- Inadequate food, clothing, or shelter
- Lack of supervision, or being left with unsuitable carers
- Failure to provide medical/dental care
- Emotional neglect: ignoring emotional needs or failing to comfort
- Poor educational attendance

Signs of Neglect:

- Constant hunger or stealing food
- Poor hygiene or inappropriate clothing
- Frequent absence from school/sessions
- Untreated injuries or illness
- Lack of speech, language, social development
- Living in unsafe or unclean environments
- Acting as a carer for siblings/others
- Left uncollected from services or unsupervised

c) Sexual abuse

Definition: Sexual abuse involves forcing or enticing a child to take part in sexual activities. It can include both contact and non-contact activities and may occur online or in person. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse).

Contact abuse includes:

Sexual touching

- Penetration (including by objects)
- Encouraging a child to engage in sexual acts

Non-contact abuse includes:

- Sexual messages/conversations online
- Showing pornography
- Watching others engage in sexual acts

Online abuse includes:

- Sexting
- Webcam abuse
- Online grooming

Signs of Sexual Abuse:

- Genital soreness, bruising, discharge, or STI
- Trouble walking or sitting

- Pregnancy
- Advanced sexual knowledge
- Sudden mood changes or sexualised behaviour

d) Child sexual exploitation (CSE)

Definition: CSE is a form of sexual abuse where young people are manipulated or coerced into sexual activities in exchange for gifts, money, or affection.

Methods:

- Grooming online or in person
- Belief in a romantic relationship
- Coercion, threats, or drugs/alcohol

Signs of CSE:

- Going missing from school or care
- Older partners or gang involvement
- Unexplained gifts or new possessions
- Substance misuse
- Truancy or academic decline
- Injuries or reluctance to explain

e) Harmful sexual behaviour (HSB)

Definition: HSB includes any sexual behaviour by a child or young person that is developmentally inappropriate or abusive. It can involve coercion, power imbalance, or violence.

Examples:

- Sexual threats or violence
- Inappropriate touching
- Using explicit language
- Full sex between children (especially with power imbalance)

Assessment tool: Refer to Brook's Traffic Light Tool for identifying healthy vs concerning behaviours.

f) Emotional abuse

Definition: Persistent emotional maltreatment that impacts a child's emotional development. Often present with other types of abuse.

Examples:

- Humiliation, criticism, blaming
- Rejection or ignoring
- Controlling behaviour
- Exposure to distressing environments (e.g. domestic abuse)
- Emotional unavailability



Signs:

- Low self-esteem or confidence
- Overly clingy or withdrawn
- Aggression towards others
- Developmental delays
- Difficulty forming friendships

g) Domestic abuse

Definition: Any controlling, coercive, threatening, or violent behaviour between intimate partners or family members. It includes physical, emotional, sexual, financial, or psychological abuse.

Children are victims if:

- They hear, see, or experience domestic abuse
- They live in an environment of intimidation

Signs:

- Anxiety or depression
- Poor academic performance
- Aggression or distress

h) Bullying and cyberbullying

Definition: Bullying is repeated behaviour intended to hurt someone emotionally or physically. Cyberbullying occurs through digital platforms.

Types:

- Verbal, physical, emotional
- Online trolling, threats, image-sharing, exclusion

Signs:

- Withdrawn behaviour
- Poor school attendance
- Lost possessions
- Self-harm or anxiety

i) Serious violent crime

Indicators:

- Unexplained gifts or money
- Truancy or exclusion
- Association with gangs
- Self-harm or injuries
- Decline in behaviour or school performance

j) Child trafficking

Definition: Child trafficking involves recruiting and moving children for exploitation. It is a form of modern slavery.

Exploitation types:

- Sexual, labour, domestic servitude, criminal exploitation

Signs:

- Not in education or medical care
- Doesn't know address
- Controlled by others or has no ID
- Often found in inappropriate places (e.g. factories, brothels)

k) Female genital mutilation (FGM)

Definition: FGM is the partial or total removal of external female genitalia for non-medical reasons.

Legal duty: FGM is a criminal offence. Known cases in under-18s must be reported to police.

Warning signs:

- Talking about 'becoming a woman'
- Travel to high-risk country
- Difficulty sitting, walking, or urinating
- Fear of medical examination

l) Radicalisation

Definition: Radicalisation is the process by which individuals come to support terrorism or extremist ideologies.

Prevent duty: Staff have a legal duty to protect children from being drawn into terrorism. Referrals may be made to the Channel programme.

Signs:

- Changes in beliefs or behaviour
- Isolation from peers
- Use of extremist language or materials

Further info: [Prevent Duty Guidance](#)

m) Child-on-child abuse



Definition: Children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse.

All staff should understand, that even if there no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL or deputy DSL and record these using CPOMS.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report

Warning signs:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually
- Consensual and non-consensual sharing of nudes and semi nude images and or videos
- upskirting, which typically involves taking a picture under a person's clothing without their permission
- initiation/hazing type violence and rituals

n) Children with a social worker

Children with social workers may face increased risks. Decisions around attendance, support, and engagement must consider this. DSLs should have access to social worker contact details and maintain strong multi-agency collaboration.

o) Children missing from education

Repeated or prolonged absence can be an indicator of abuse, neglect, or exploitation. Local authorities must be informed of children missing education if there are safeguarding concerns.

p) Looked-after children (Iac)

Staff must be aware of the increased vulnerability of looked-after and previously looked-after children and understand the impact of trauma and attachment issues.

q) Mental health



Mental health issues can indicate abuse, neglect, or exploitation. Staff should be alert to signs but are not expected to diagnose. Concerns must be referred to the DSL.



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2. Guidance on how to respond to a child who discloses abuse

DO:	DO NOT:
<ul style="list-style-type: none"> ✓ Stay calm and listen carefully. Allow them to speak freely and in their own time. ✓ Reassure the child that they have done the right thing by telling you. ✓ Believe what the child is telling you. Avoid expressing doubt, shock, or disbelief. ✓ Be honest. Let the child know that you that you may need to share the information with others to keep them safe. ✓ Explain what will happen next in a way that is appropriate to their age and understanding. ✓ Only ask open questions if needed, such as “Can you tell me more about that?” ✓ Record what the child says in their own words, as soon as possible after the disclosure. Include the time, date, and your signature. ✓ Report the concern immediately to the DSL or deputy DSL. ✓ Continue to support the child emotionally. <p>👉 <i>If the concern involves a young adult aged 18–25, refer to the Safeguarding Adults Policy and Procedure.</i></p>	<ul style="list-style-type: none"> ✗ Promise confidentiality. Never promise to keep the disclosure a secret, this may not be possible. ✗ Ask leading questions, example “Did they do X to you?” Leave the investigation to social care or the police. ✗ Interrupt, rush, or show disapproval or disbelief during the disclosure. ✗ Make assumptions or speculate. Stick to the facts, don’t interpret or add your own views. ✗ Make the child repeat their story unnecessarily, this can cause additional distress. ✗ Leave the child without support, always pass on your concern and check the child’s immediate safety. ✗ Delay reporting. Report immediately.

Our Commitment to Safeguarding Children

We are committed to safeguarding and promoting the welfare of each child and work within the framework of the Children Act 1989, the Children Act 2004 and Every Child Matters, Working Together to Safeguard Children which promotes inter-agency working to safeguard and promote the welfare of children as paramount.

If you are concerned about the wellbeing of any child or suspect that a child is being, or is at risk of being, neglected or abused physically, emotionally or sexually:

Do not keep these concerns to yourself:

- If a child is at immediate risk, call the on-call manager or DSL and do not delay action for permission, they advise on what further action to take.
- If we are concerned about your child, we will talk to you as soon as possible unless it could affect a criminal investigation.
- It is important to keep accurate records.



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Safeguarding Contacts		
Harrow Children's MASH Team (Front Door)	Golden Number 020 8901 2690	duty.assess@harrow.gov.uk
Children and Young People with Disabilities 0-25 years	0208 966 6481	
The emergency duty social worker is available all weekend and on Bank holidays.	020 8424 0999	duty.assess@harrow.gov.uk
Local Authority Designated Officer (LADO)	Golden Number 020 8901 2690	rosalind.south@harrow.gov.uk lado@harrow.gov.uk (on-going cases: 02087366435)
Ofsted	0300 123 1231	enquiries@ofsted.gov.uk
NSPCC	0800 800 5000	
Childline	0800 1111	
LDN London CEO - Gabby Machell	07951 601 598	gmachell@LDNLondon.org
LDN London Assistant CEO- Growth, Innovation and Transformation- Mandy Crawford	07947 614 881	mcrowford@LDNLondon.org

Useful links
Harrow Safeguarding Children Board
NSPCC
London Safeguarding Children Procedures