Safeguarding Policy

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Ethos Statement

TAO Independent School provides a nurturing, relational, and therapeutic learning environment where every child is known, valued, and supported. We believe that safety, trust, and belonging are the foundations of growth.

Our curriculum and culture are shaped by outdoor learning, trauma-informed practice, and compassion. This policy reflects these principles and sets out how we meet our legal and statutory responsibilities to maintain the highest standards of safeguarding.

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Purpose

This policy is intended to protect people who receive any service from us, including those who are the children of adults who may receive services from us.

As an organisation we believe that no person should experience abuse or harm and are committed to the protection of people and this policy is intended to provide guidance and overarching principles to those who represent us as volunteers or staff, to guide our approach to child protection and safeguarding.

We will listen to our pupils. We will not place any value judgement on their concerns or supersede their views with our own cultural or racial profiling to ensure we fully listen

to what our pupils are saying. We will take our pupils' health and welfare seriously and act with urgency to prevent harm and keep them safe. We adopt a *whole school approach to safeguarding*, where safeguarding and child protection underpin all relevant policies and processes. We operate with the best interests of the child at heart.

The TAO Independent School Team has adopted this Safeguarding Children Policy and expects every adult working or helping at TAO Independent School to support it and comply with it. Consequently this policy shall apply to all staff, managers, trustees, directors, volunteers, students or anyone working on behalf of TAO Independent School.

Safeguarding is the umbrella term for everything TAO does to keep pupils safe and promote their welfare. In line with Keeping Children Safe in Education 2026, this includes:

- **providing help and support to meet pupils' needs as soon as problems emerge**
- **protecting pupils from maltreatment, whether that happens within or outside the home, including online**
- **preventing impairment of pupils' mental and physical health or development**
- **ensuring pupils grow up in circumstances consistent with the provision of safe and effective care**
- **taking action to enable all pupils to have the best outcomes**

Child protection is the activity undertaken to protect specific pupils who are suffering, or are likely to suffer, significant harm. It is part of TAO's wider safeguarding responsibilities, and the procedure for responding to a child protection concern is set out in Section 11.

Principles

To have a child centred approach to safeguarding, children have stated they want the following:

- **Vigilance:** To have adults notice when things are troubling them.
- **Understanding and Action:** To understand what is happening, to be heard and understood, and to have that understanding acted upon.
- **Stability:** To be able to develop an ongoing stable relationship of trust with those helping them.
- **Respect:** To be treated with the expectation that they are competent rather than not.
- **Information and Engagement:** To be informed about and involved in procedures, decisions, concerns, and plans.

- **Explanation:** To be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.

- **Support:** To be provided with support, alongside support for their family where appropriate.

- **Advocacy:** To be provided with advocacy to assist them in putting forward their views.

- **Protection:** To be protected against all forms of abuse and discrimination, and to receive special protection and support if they are a refugee.

The Legal Framework

Legal Framework

This policy has been developed in accordance with the following legislation and statutory guidance:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education (Independent School Standards) Regulations 2014, as amended
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Counter-Terrorism and Security Act 2015 and the Prevent Duty guidance
- Data Protection Act 2018 and UK GDPR
- Children and Families Act 2014, where relevant to pupils with SEND
- Human Rights Act 1998

TAO Independent School recognises that safeguarding and promoting the welfare of children is everyone's responsibility. The school works with the relevant local safeguarding partners and other statutory agencies to protect pupils, share information lawfully and secure appropriate support where concerns arise.

The Proprietor is responsible for ensuring that arrangements are in place to safeguard and promote the welfare of pupils and that the school meets the requirements of the Independent School Standards. The Headteacher, as Designated Safeguarding Lead, holds lead operational responsibility for safeguarding and child protection

At TAO, we acknowledge our legal duty to work with other organisations to keep our pupils safe. In Sept 2026, the Department for Education updated *Keeping Children Safe in Education* to reflect heightened emphasis on:

- Filtering and monitoring standards on school networks.

- Clarification of the roles and oversight responsibilities of Governors and Trustees.

- Recognising safeguarding risks in Independent Schools.
- Embedding a trauma-informed approach across all safeguarding practice.

TAO has reviewed and updated its safeguarding policy and training in line with these 2026 changes.

This guidance contains information on what independent schools, schools, including academies, and APs should do and sets out the legal duties which they must comply with. In law, individual academies are deemed to be 'relevant partners' of their local authority and as such are under a duty to cooperate in that local authority's safeguarding partnerships board arrangements.

The Education (Independent School Standards) Regulations 2014 place a duty on proprietors of independent schools, including academies, to make arrangements to ensure their functions are exercised with a view to safeguarding and promoting the welfare of children.

Reporting matrix

Role	Name	Responsibility	When this person is contacted
Proprietor	Danny Giblin danny@taoactivities.co.uk	holds strategic and governance oversight of, and accountability for, safeguarding across TAO Independent School; receives regular assurance regarding safeguarding practice; and manages any concern or allegation involving the Headteacher	Strategic oversight, safeguarding accountability
Designated Safeguarding Lead (DSL)	Headteacher headteacher@taoeduca	Day-to-day safeguarding responsibility, managing concerns, liaison with external	All safeguarding concerns, disclosures, or allegations

Role	Name	Responsibility	When this person is contacted
	tiongroup.co.uk	agencies, The Headteacher holds lead operational responsibility for safeguarding and child protection at TAO Independent School	
Deputy DSL (DDSL)	SENDCo sendco@taoeducationgroup.co.uk	Acts in the absence of the DSL and supports safeguarding processes	When DSL is unavailable
All Staff	All staff	Duty to safeguard pupils and report concerns immediately All staff must read and understand Part One of Keeping Children Safe in Education 2026 and understand that safeguarding is everyone's responsibility	Any safeguarding concern or disclosure
IT responsibility	IT Support Provider / Nominated IT Lead	supports the implementation of filtering and monitoring systems; ensures the filtering provider is kept appropriately updated; and reports on the effectiveness of filtering and monitoring	Review, audit, and oversight, any IT breaches

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Role	Name	Responsibility	When this person is contacted
		arrangements to the DSL.	

All safeguarding concerns are reported immediately to the Designated Safeguarding Lead (DSL). In the absence of the DSL, concerns are reported to a Deputy DSL. If no DSL or DDSL is available and there is an immediate risk, staff will contact Children's Social Care or the Police directly and inform the DSL as soon as possible thereafter.

Our Commitment

TAO commitment to safeguarding includes:

- Ensuring there is a designated safeguarding professional who has received appropriate training to fulfil the role.
- TAO recognises that racism, faith-based prejudice and other discriminatory behaviour can cause significant harm in their own right and may constitute a safeguarding concern
- All staff must read and understand Part One of Keeping Children Safe in Education 2026 and understand that safeguarding is everyone's responsibility
- Ensuring all staff understand their responsibility to safeguard pupils.
- Understanding the latest KCSIE 2026 guidance on responding to low-level concerns, and ensuring conduct contributes to a safe culture, particularly in outdoor, therapeutic, and off-site environments.
- Having safeguarding arrangements in place that consider all possible safeguarding issues both locally, nationally, and internationally.
- Adopting a whole- school approach to safeguarding, promoting a culture of vigilance that permeates throughout our school.
- Ensuring all safeguarding concerns are investigated, and that immediate risk assessments are undertaken to keep pupils safe.
- Adhering to safer recruitment practices.

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- Ensuring we work closely with other agencies and share information appropriately, in line with statutory requirements.

- Having effective child protection policies in place.

- Developing a culture of listening to children and taking into account their wishes and feelings.

- Ensuring there is no unlawful discrimination against pupils with protected characteristics. TAO actively identifies and challenges racism and discrimination as part of its safeguarding culture and its responsibility to keep every pupil safe

- Taking positive action to support these pupils and address any disadvantages they may face.

- Providing appropriate supervision and support for staff, including safeguarding induction and ongoing training.

- Following procedures for handling allegations or concerns raised in relation to teachers, assistants, all other staff, and volunteers.

- Having clear whistleblowing procedures

- Fulfilling all statutory responsibilities in respect of safeguarding and promoting the welfare of children.

- Ensuring the TAO Safeguarding and Child Protection Policy incorporates all legislation and expectations from KCSIE 2026.

Staff registers are in place to ensure staff acknowledge and sign to state they have read the accompanying documentation and are aware of TAO commitment to safeguarding.

The TAO Safeguarding and Child Protection Policy is monitored and evaluated to measure its effectiveness within the school. This is carried out through the quality assurance cycle, at least annually.

Expectations

We expect staff to have read and be aware of:

- Keeping Children Safe in Education 2026, Part One.

- Safer Working Practices (Safer Recruitment Consortium, May 2022) and the Staff Code of Conduct.

- Safeguarding and Child Protection Policy.
- GDPR and Data Protection Requirements.
- Their local family help processes, and their roles in relation to them.

All staff are also required to:

- Understand that safeguarding is the responsibility of every adult, for every pupil.
- All staff must read and understand Part One of Keeping Children Safe in Education 2026 and understand that safeguarding is everyone's responsibility
- Take all concerns seriously, particularly when a disclosure is made.
- Recognise that pupils may not always feel ready or able to disclose concerns, but maintain professional curiosity and an open, observant approach.
- Consider the wider context of each pupil (environmental, social, and familial factors) when there are safeguarding concerns.
- Put the pupil's interests first and act to always secure their safety.
- Be vigilant and take responsibility for maintaining the safeguarding ethos.
- Immediately inform the DSL of any changes in personal circumstances that may impact their suitability to work with pupils.

Employment and Management of Adults Working with Pupils

We will ensure that TAO has:

- A single point of contact known as the Designated Safeguarding Lead (DSL), and Deputy Designated Safeguarding Leads (DDSLs).
- A single central record of pre-employment checks.
- Safer recruitment procedures fully in place.
- Appropriate checking procedures.
- A policy and procedures for dealing with allegations or concerns raised in relation to teachers, assistants, other staff, volunteers, and contractors.

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- The TAO Safeguarding Policy available to parents, carers, and pupils on request, and accessible via our website.

Pupils are taught about safeguarding, including online safety, through a range of teaching and learning opportunities as part of a broad and balanced curriculum. This is detailed in our Safeguarding Curriculum Map.

Scope of the Policy

We safeguard pupils when we believe they are experiencing, or are at risk of, any of the following:

Main Categories of Abuse:

- Physical abuse.
- Emotional abuse.
- Sexual abuse.
- Neglect.

Exploitation and Criminal Risks:

- Child criminal exploitation (CCE).
- Child sexual exploitation (CSE).
- County lines.
- Trafficking and modern slavery.

Peer and Relationship-Based Risks:

- Child-on-child (peer-on-peer) abuse.
- Bullying, including cyberbullying.
- Domestic abuse. Children can be victims of domestic abuse in their own right, including where they see, hear or experience the effects of domestic abuse TAO Independent School will participate in Operation Encompass once the school's registration is complete and the necessary local arrangements are in place. The Headteacher/DSL will act as the school's Operation Encompass Key Adult
- Gender-based violence / Violence against women and girls (VAWG).
- Homophobic or transphobic abuse.
- Forced marriage and honour-based abuse.

Health, Faith or Family-Related Risks:

- Fabricated or induced illness.
- Faith abuse. Faith-targeted abuse and prejudice-based harm
- Female genital mutilation (FGM).
- Private fostering.
- Mental health.

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Online & Technological Risks:

- Online and technology abuse.
- Sexting / Youth-produced sexual imagery.
- Radicalisation and extremism.- Staff remain alert to radicalisation through online and algorithm-driven content, including AI-generated extremist material, right-wing extremism and misogyny-driven radicalisation

Contextual and Social Risk Factors:

- Drugs and substance misuse.
- Gangs and youth violence.
- Homelessness.
- Wider contextual safeguarding concerns.

Emerging and Identity-Based Vulnerabilities:

- Challenges experienced by pupils facing transgender or body dysmorphia issues.

This list is not exhaustive.

Safeguarding Roles and Responsibilities of TAO Staff

TAO Independent School is currently in a pre-registration phase. The Headteacher holds lead operational responsibility for safeguarding and child protection as the Designated Safeguarding Lead (DSL). The SENDCo acts as Deputy Designated Safeguarding Lead (DDSL). The Proprietor retains strategic and governance oversight of, and accountability for, safeguarding arrangements across the school.

It is TAO's responsibility to provide a safe environment in which pupils can learn.

- The safety of our learning venues is of high importance. It is everyone's responsibility to keep our venues safe.

- We train staff to be aware of safety risks and ensure they are able to evacuate venues should they pose any risk to pupils.

- TAO promotes an inclusive, anti-discriminatory culture as an integral part of its whole-school safeguarding approach.

- Clear systems are in place to ensure that any staff member can report a health and safety concern immediately, using direct communication followed by an email where required.

- We actively seek the views of pupils regarding the safety of the venues and respond swiftly to any concerns to ensure their safety and wellbeing.

Teachers and Training

At TAO, we acknowledge that some pupils may need extra help or may be suffering, or are likely to suffer, significant harm. Staff must be able to identify these pupils quickly. All staff have a responsibility to take appropriate action, working with external services where necessary.

The Proprietor ensures safeguarding systems, including the Single Central Record and safeguarding records, are maintained and reviewed regularly.

Compliance Manager

The Compliance Manager is responsible for maintaining regulatory compliance across safeguarding, health and safety, curriculum documentation, staff training records, the Single Central Record and statutory returns. The Compliance Manager does not hold safeguarding decision-making authority but ensures that systems and records robustly support safeguarding practice.

Safeguarding and Compliance Escalation Structure
• Staff → Designated Safeguarding Lead (Headteacher, headteacher@taoeducationgroup.co.uk **03301070050**)
• DSL unavailable → Deputy DSL (SENDCO, SENDCO@taoeducationgroup.co.uk **03301070050**)
• Concern about the Headteacher/DSL → Proprietor. Concern about the Proprietor → appropriate external safeguarding route, including the LADO where appropriate
• Compliance or documentation concerns → Compliance Manager → DSL / Proprietor

Staff induction will include the organisation's vision, aspirations, expectations of all staff, and clarity around acceptable and unacceptable behaviour. Staff will also receive information about the systems within the school that support safeguarding. This includes the child protection and safeguarding policy, the staff behaviour policy (Code of Conduct), and the role of the DSL.

All staff will:

- read and understand Part One of Keeping Children Safe in Education 2026 and understand that safeguarding is everyone's responsibility.

- Receive regular safeguarding training that is regularly updated, ensuring they are equipped with the knowledge and skills to keep pupils safe.

The key training elements are:

- The safeguarding and Child Protection Policy.
- The Staff Behaviour Policy (Code of Conduct) and Whistleblowing Policy.
- The role and identity of the Designated Safeguarding Lead (DSL) and any deputies (DDSLs). (See KCSIE 2026).
- Any local safeguarding procedures and policies related to specific activities.

All safeguarding training will be recorded and maintained to ensure it is up to date for both internal and external scrutiny.

The Roles and Responsibilities of the Designated Safeguarding Lead (DSL)

The Headteacher, as Designated Safeguarding Lead, holds lead operational responsibility for safeguarding and child protection

The DSL will:

- Support staff to understand safeguarding within the wider context of a pupil's life, considering family circumstances, friendship groups, and social context when making decisions to keep pupils safe.
- Adopt a whole- school approach to safeguarding, promoting a culture of vigilance that permeates throughout the organisation.
- Support staff to develop the skills and knowledge required to encourage a listening culture and reduce barriers to disclosure.
- Manage referrals made by staff or those received from outside the school.
- Work with external agencies and professionals on matters related to safety and safeguarding.
- Keep up to date with the latest advice, legislation, and guidance relating to safeguarding and child protection.
- Raise awareness of safeguarding and child protection among staff, parents, and pupils.
- Ensure that child protection information is securely transferred to a pupil's new education setting within five school days, where applicable.
- Ensure all staff follow the school's safeguarding policies in full.
- Act upon referrals in a timely manner, always acting in the best interests of the pupil.

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- Help promote educational outcomes by ensuring that staff are aware of the safeguarding, welfare, and child protection issues pupils may be experiencing, including those with a social worker.

  Support staff to:

  - Understand who these pupils are.
  - Recognise their academic progress and attainment.
  - Maintain high aspirations for them and make appropriate academic support and adjustments.

- Ensure plans in place to support pupils with safeguarding needs are robust, monitored, and clearly shared with relevant staff involved in supporting the pupil.

- Provide safeguarding training and support to pupils, parents, and carers.

  Ensure visitors receive appropriate safeguarding information and are supervised where required according to their role and the checks completed. Where appropriate, assurance regarding relevant safeguarding checks will be obtained and retained, and any information required to be recorded on the Single Central Record will be recorded there

- Understand the importance of information sharing and ensure that all relevant agencies receive information in a timely and lawful manner.

A Deputy DSL will always be appointed to cover when the DSL is unavailable.

Designated Safeguarding Leads (DSL Team):
DSL Headteacher
Contact: headteacher@taoeducationgroup.co.uk **03301070050**

DDSL

SENDCO@taoeducationgroup.co.uk **03301070050**

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Roles and Responsibilities of Other Staff

- It is everyone's responsibility to keep pupils safe, and all staff are expected to take this responsibility seriously.

- All staff must read and understand Part One of Keeping Children Safe in Education 2026 and understand that safeguarding is everyone's responsibility

- Staff must abide by all safeguarding policies and procedures to keep pupils safe.

- Any concerns must be shared with the DSL. No staff member should keep information to themselves or decide independently whether a situation is safe or unsafe. Policy and procedures must always be followed.

- If staff are unsure, they should speak to the DSL to clarify the situation and agree whether any action is needed. Staff must record all concerns and forward these to the DSL or Deputy DSL. Staff will work with the DSL, and where appropriate, support social workers in making decisions about individual pupils.

- All staff, including volunteers and temporary staff, must understand how the school safeguards and promotes the welfare of pupils. This includes being familiar with the Safeguarding and Child Protection Policy, their safeguarding roles and responsibilities (including in relation to family help), and knowing how to report any concerns.

- All staff must remain vigilant and report any behaviours that may cause concern, even if the concern seems minor. This includes concerns about colleagues, visitors, or volunteers.

- TAO ensures that annual safeguarding refresher training explicitly references KCSIE 2026 updates, including online risks, child-on-child abuse, and trauma-aware practice.

Staff Training

All staff receive safeguarding and child protection training as part of induction and receive safeguarding updates and refreshers at least annually. New staff receive safeguarding induction before working with pupils. The DSL and DDSL complete DSL-level training at least every two years and update their safeguarding knowledge and skills at least annually. Additional training and professional development is provided according to role, responsibility and identified need

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Safe Environment / Contextual Safeguarding – Pupils are Safe and Feel Safe

- All our pupils are taught about safeguarding, including online safety (using non-statutory guidance and information in KCSIE 2026), through various teaching and learning opportunities, as part of delivering a broad and balanced curriculum.

- At TAO, we adopt an open and accepting attitude towards pupils as part of our pastoral care responsibility. We are committed to considering pupils' contextual circumstances, as behaviours that may appear as 'poor quality behaviour' can be linked to wider contextual issues such as abuse at home, child-on-child abuse, or abuse online. Pupils, parents, and staff should feel free to discuss concerns, and the school should be seen as a safe place when difficulties arise. We promote an ethos of disclosure, listening, and believing, to build confidence among pupils.

- Pupils' worries and fears will always be taken seriously, and they will be encouraged to seek help from staff.

- TAO promotes an inclusive, anti-discriminatory culture as an integral part of its whole-school safeguarding approach.

- Extra-familial harms take a variety of different forms. Children can be vulnerable to multiple harms including, but not limited to, sexual abuse, exploitation, criminal exploitation, county lines, and serious youth violence.

- Safeguarding education is embedded across the curriculum, including PSHE, RSHE, therapeutic provision, outdoor education, and subject-specific schemes of work. Staff use curriculum-based observation, assessment for learning, and relational practice to identify safeguarding concerns early, ensuring safeguarding is proactive, contextual, and aligned with teaching and learning.

We will therefore ensure that:

- An ethos is established and maintained where pupils feel secure, are encouraged to talk, are listened to, taken seriously, and responded to appropriately.

- We regularly seek pupils' views regarding the safety of our school venues, including areas where abuse could occur or where they may not feel safe.

- Pupils are meaningfully involved in decision-making processes that affect them.

- Pupils know that there are trusted adults in the school whom they can approach if they are worried or have difficulties, and that the school has well-developed listening systems.

- Proactive curriculum activities and opportunities are provided to equip pupils with the skills they need to stay safe from abuse.

- There is a clear written statement setting out the standards of behaviour and boundaries of appropriate conduct expected of staff and pupils, which is understood and endorsed by all.

- Positive and safe behaviour is encouraged among pupils, and staff are alert to changes in a pupil's behaviour, recognising that challenging behaviour may be an indicator of abuse.

- Effective working relationships are established with parents and with colleagues from partner agencies.

- There is awareness that personal and family circumstances and lifestyles of some pupils may increase their risk of neglect and/or abuse.

- Staff are appropriately trained in safeguarding according to their roles and responsibilities, have regular opportunities for safeguarding briefings, and accurate records are kept of all training undertaken.

- Safer recruitment procedures are in place to ensure all appropriate checks are carried out on staff and volunteers working with pupils.

Vulnerable Pupils

We recognise that some pupils will be at increased risk of neglect and/or abuse. Many factors can contribute to this increased risk, including prejudice and discrimination, isolation, social exclusion, communication difficulties, and reluctance by some adults to accept that abuse happens, or a high level of tolerance towards neglect.

Some children are particularly vulnerable to harm, especially children who have a social worker (those on Child in Need or Child Protection Plans).

Children may require a social worker due to safeguarding or welfare needs arising from abuse, neglect, or complex family circumstances. A pupil's experiences of adversity and trauma can leave them vulnerable to further harm and may also result in educational disadvantages, affecting attendance, learning, behaviour, and mental health.

Local Authorities will inform us when a child has a social worker. The Designated Safeguarding Lead will hold and use this information to help make decisions in the best interests of the child's safety, welfare, and educational outcomes. This will be considered routinely when planning support.

When children have a social worker, this helps inform our decision-making about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (including the provision of pastoral and/or academic support, alongside action by statutory services).

To ensure equal protection for all pupils, we will give special consideration to those who are or have:

- Disabled, or have special educational needs (including certain health conditions).

- A mental health need.

- Living in a known domestic abuse situation.

- Affected by known parental substance misuse (drugs and/or alcohol).

- Asylum seekers or refugees.

- Newly arrived from overseas or part of new communities.
- Living away from home, including private fostering arrangements.
- Vulnerable to being bullied or engaging in bullying.
- Missing from education, particularly on repeat occasions.
- Living in temporary accommodation.
- At risk of child-on-child abuse.
- Living transient lifestyles.
- Living in chaotic, neglectful, or unsupportive home situations.
- Vulnerable to discrimination or maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality, including at risk of honour-based abuse.
- Pupils affected by racism, faith-based prejudice or other discriminatory behaviour may experience significant harm to their welfare, wellbeing and sense of safety.
- At risk of sexual exploitation.
- Young carers.
- Looked After Children (LAC) or previously looked after.
- Without English as a first language.
- Vulnerable due to Child Criminal Exploitation (CCE) or Child Sexual Exploitation (CSE).
- At risk from County Lines.
- Living with family members in prison.
- Experiencing multiple vulnerabilities (intersectional risk), as highlighted in KCSIE 2026.
- A need to consider the wider context of their individual needs.

Special consideration includes ensuring safeguarding information, resources, and support services are available in community languages and accessible formats.

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Mental Health

At TAO, we take our responsibility for supporting and promoting the mental health and wellbeing of our pupils very seriously. We recognise that mental health difficulties can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation.

We have clear systems and processes in place to identify potential mental health concerns, including routes for escalation, referral, and clear accountability procedures.

As part of ongoing CPD, we are committed to all members of staff being informed in Mental Health awareness.

Staff must report significant or unexplained deterioration in a pupil's mental health, behaviour, attendance or engagement to the DSL. Where there is immediate danger to life, emergency services must be contacted. For urgent but non-life-threatening health advice, staff may contact NHS 111 or seek advice through the appropriate health professional

Attendance and Safeguarding

Poor or irregular attendance can be an indicator that a pupil is at risk. TAO treats sudden, persistent or unexplained changes in attendance as a potential safeguarding concern. Attendance concerns are managed and escalated in accordance with the Attendance & Punctuality Policy, including local authority referral where required

Child-on-Child Abuse

TAO maintains a zero-tolerance approach to child-on-child abuse, recognising that such incidents can occur in any environment, including outdoor and group settings.

Child-on-child abuse includes, but is not limited to:

- **Physical abuse:** hitting, kicking, biting, hair pulling, or causing physical harm.
- **Sexual violence and harassment:** inappropriate touching, upskirting, sexting, coercion, or sexual assault.
- **Bullying (including cyberbullying):** name-calling, social exclusion, or intimidation.
- **Harmful sexual behaviour:** inappropriate or coercive sexual behaviour between peers.
- **Initiation or hazing-type violence and rituals:** forcing a child to participate in humiliating or harmful acts.
- **Harassment**; abuse within intimate personal relationships between children; and AI-generated or manipulated intimate imagery, including deepfake imagery

- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based harm.

Staff should understand that a child under 13 cannot legally consent to sexual activity and that the age of consent is 16. Any concern regarding harmful or abusive sexual behaviour must be treated as a safeguarding matter

Weapons and Serious Violence

Any concern that a pupil is carrying, using, or intends to use a weapon must be reported to the DSL or DDSL immediately. The DSL will assess the immediate risk and determine appropriate action, including de-escalation, safeguarding referral and/or police involvement where necessary

We proactively prevent and address child-on-child abuse through:

1. Educating Pupils:

- Delivering age-appropriate lessons on consent, boundaries, respect, and healthy relationships.
- Providing online safety education to prevent cyberbullying and exploitation.

2. Staff Training & Awareness:

- Training all staff to recognise signs of child-on-child abuse, including harmful language and power imbalances in child (peer) relationships.
- Ensuring staff challenge inappropriate behaviour and do not dismiss harmful actions as ‘banter’ or ‘part of growing up’.

3. Creating Safe Outdoor Learning Spaces:

- Promoting teamwork, trust, and respect in supervised and structured environments.
- Remaining vigilant to power imbalances in group dynamics and intervening early.

4. Clear Reporting and Support for Victims:

- Encouraging pupils to report concerns to trusted adults, DSLs, or through designated reporting channels.
- Promptly investigating all reported incidents and providing appropriate support to both victims and perpetrators.

- Making referrals to external agencies such as CAMHS, Social Care, or the Police where necessary.

5. Disciplinary Actions:

- Addressing incidents on a case-by-case basis, ensuring proportionate consequences.

- Collaborating with parents, carers, and external safeguarding professionals where appropriate.

All staff have a duty to act immediately if they suspect or witness abuse. If in doubt, staff must report to the DSL without delay.

Preventing Child-on-Child Abuse

We take proactive steps to prevent and address child-on-child abuse by:

1. Educating Pupils:

- Delivering age-appropriate lessons on consent, boundaries, respect, and healthy relationships.

- Providing online safety education to prevent cyberbullying, exploitation, and sexual harm.

2. Staff Training & Awareness:

- All staff receive training on recognising the signs of child-on-child abuse, including harmful language, coercive behaviour, or power imbalances in peer relationships.

- Staff are trained to challenge inappropriate behaviours and not dismiss harmful actions as 'banter' or 'part of growing up'.

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3. Creating Safe Outdoor Learning Spaces:

- Activities promote teamwork, trust, and respect within controlled and supervised environments.

- Staff remain vigilant to power imbalances during group activities and intervene early where concerns arise.

4. Clear Reporting and Support for Victims:

- Pupils are encouraged to report concerns to trusted adults, DSLs, or through designated reporting channels.

- All reported incidents are investigated promptly, with appropriate support provided to both victims and perpetrators.

- Where needed, referrals are made to external agencies, including CAMHS, Social Care, or the Police.

5. Disciplinary Actions:

- Incidents are addressed on a case-by-case basis, with proportionate consequences.

- We work collaboratively with parents, carers, and external safeguarding professionals when appropriate.

Our Culture and Approach

Child-on-child abuse is never tolerated. All staff have a duty to act immediately if they suspect or witness abuse.

If in doubt, staff must report to the DSL without delay.

All our staff are aware that child-on-child abuse can occur both inside and outside of school, and online. Staff are trained to recognise the signs and indicators of such abuse and know how to identify, record, and respond appropriately.

TAO adopts a zero-tolerance approach, whereby all staff understand that even if there are no reported incidents, it does *not* mean it is not happening, it may simply be unreported.

If staff have any concerns regarding child-on-child abuse, they must speak to the Designated Safeguarding Lead (or Deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are abusive in nature. Staff must not downplay or dismiss behaviours such as bullying, harassment, or sexualised language as “just banter”, “just having a laugh”, “part of growing up”, or “boys being boys”. This attitude can lead to a culture of unacceptable behaviours, an unsafe environment for pupils, and in the worst cases, a culture that normalises abuse, leading to children accepting it as normal and not reporting it.

All staff must be clear about the school’s policy and procedures regarding child-on-child abuse and understand the important role they play in both preventing it and responding when they believe a pupil may be at risk.

We ensure that there are multiple and accessible avenues for pupils to report any form of child-on-child abuse, including:

- Speaking directly to a trusted member of staff
- Speaking to a Designated Safeguarding Lead (DSL)
- Using the NSPCC helpline: **0808 800 5000**
- Alternatively, pupils can also contact our local safeguarding partner via: LADO.cases@kirklees.gov.uk
- 01484 221126
-

Misogyny and Violence Against Women and Girls

TAO recognises misogyny as discriminatory behaviour which may also constitute or indicate a safeguarding concern. Misogynistic language, harassment and behaviour are challenged and addressed through safeguarding, behaviour, pastoral support and the curriculum as appropriate

Online Safety

At TAO, we believe it is essential that pupils are safeguarded from potentially harmful and inappropriate online content. An effective whole- school approach to online safety empowers us to protect and educate pupils, and support staff in their use of technology. It also enables us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues within online safety is wide, but can be categorised into the following four areas of risk:

1. Content:

Being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism, artificial intelligence, deepfakes, generative AI, AI chatbots, image-generation tools and nudification tools Staff remain alert to radicalisation through online and algorithm-driven content, including AI-generated extremist material, right-wing extremism and misogyny-driven radicalisation

2. Contact:

Being subjected to harmful online interactions with others, including child (peer) pressure, commercial advertising, grooming, or exploitation (sexual, criminal, financial, or otherwise).

3. Conduct:

Personal online behaviours that increase the likelihood of harm, including creating, sending, or receiving explicit images (consensual or non-consensual sharing of nude or semi-nude images), and online bullying or harassment.

4. Commerce:

Exposure to scams or financial exploitation, such as: phishing, online gambling, or fraudulent financial schemes.

We ensure that online safety is a running and interrelated theme across:

- Safeguarding and Child Protection policies
- Curriculum planning
- CPD and staff induction
- DSL responsibilities
- Parental engagement

From September 2026, the DfE requires strengthened arrangements for monitoring and filtering on school IT systems. TAO's IT infrastructure meets these requirements. All staff are trained to recognise online risks including radicalisation, grooming, exploitation, and coercion, Staff remain alert to radicalisation through online and algorithm-driven content, including AI-generated extremist material, right-wing extremism and misogyny-driven radicalisation. Policies are proactively reviewed to ensure alignment with the 2026 standards.

As part of our duty to provide a safe learning environment, we do all that is reasonably possible to limit pupils' exposure to online risks through our IT network. We ensure appropriate filtering, monitoring, and supervision systems are in place, proportionate to the age, needs, and vulnerabilities of our pupils.

Technical implementation and review of filtering and monitoring systems is supported by the IT Support Provider/Nominated IT Lead. Safeguarding oversight of filtering and monitoring arrangements remains with the DSL. The effectiveness of the school's filtering and monitoring arrangements is reviewed at least annually. The review records checks undertaken, issues identified and action taken in line with our e safety policy

Multi-Agency Working

We recognise that we have a pivotal role to play in multi-agency safeguarding arrangements and will ensure that we contribute to multi-agency working in line with statutory guidance, *Working Together to Safeguard Children*.

TAO Independent School will participate in Operation Encompass once the school's registration is complete and the necessary local arrangements are in place. The Headteacher/DSL will act as the school's Operation Encompass Key Adult.

New safeguarding partner and child death review arrangements are now in place.

Locally, the three safeguarding partners — the Local Authority, the Integrated Care Board (formerly Clinical Commissioning Group), and the Chief Officer of Police — have published arrangements that enable appropriate organisations, including TAO, to work collaboratively to safeguard and promote the welfare of children. This includes contributing to the identification of needs, assessing risk, and sharing information to support timely and appropriate intervention.

Working with Parents and Carers

- We recognise the importance of working in partnership with parents and carers to educate, safeguard, and promote the welfare of pupils.

At TAO, we will ensure that:

- We work with parents positively, openly, and honestly.
- Parents are encouraged to discuss any concerns regarding the safety and welfare of pupils; they will be listened to and taken seriously.
- We provide parents with information about the support available to keep pupils safe within the school, locally, and nationally.

We maintain up-to-date and accurate information about pupils, including:

- Names of adults with whom the pupil normally lives
- Those with parental responsibility
- Emergency contact details
- Details of adults authorised to collect the child (if different)
- Relevant court orders
- Any information which may impact the child's welfare, safety, or access arrangements

The Local Authority will provide initial essential pupil information at the point of admission. This is supplemented through our registration/enrolment form, which collects emergency contact information and safeguarding-relevant data.

Information provided by pupils, parents, carers, or other agencies will remain confidential unless safeguarding concerns require sharing with other professionals. Staff will only receive safeguarding information on a strict *need-to-know* basis to support the child.

We make it clear to parents and carers that:

- Information may be shared with relevant agencies under GDPR provisions, particularly where safeguarding concerns involve **Special Category Personal Data**.
- We have a statutory duty to share information where there are safeguarding concerns.
- Safeguarding records will be kept securely, separately from the main pupil file, and accessed only by designated staff.
- We are required to keep relevant safeguarding records, in line with Working Together to Safeguard Children, KCSIE 2026, and the Child Sexual Abuse (CSA) Strategy (2014) requirements.

Reporting Concerns

When adults in the school have a concern about a child or young person, they should follow the appropriate procedures below:

1. If a pupil is at immediate risk of harm or danger:

Where there is immediate danger to life or an immediate risk of serious harm, staff must contact emergency services where necessary and alert the DSL/DDSL immediately. The concern and action taken must then be recorded promptly on the school's safeguarding recording system." Emergency action comes before paperwork

- Promptly complete a safeguarding record on the school secure system.
- Submit the completed form immediately to a Designated Safeguarding Lead (DSL).
- If a paper copy is used, it must be physically scanned and sent to the DSL without delay.

2. If the concern relates to Female Genital Mutilation (FGM):

- Where a staff member discovers or is directly informed that an act of FGM has been carried out on a pupil (under 18), they have a legal duty to report it directly to the police.
- A written safeguarding record on the school secure system must also be completed and shared with the DSL.

For Cases Where There is a General Concern

Where there is no immediate risk of harm, but a staff member has concerns (e.g. a pupil frequently appears hungry, tired, or unkempt), the staff member should record their concerns with factual observations.

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It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. This is the role of Children's Social Care. However, all staff have a duty to recognise and record concerns, remain professionally curious, and discuss them with the Designated Safeguarding Lead (DSL).

All concerns relating to a pupil's welfare should be recorded as early as possible and shared with the DSL, or the Deputy DSL in their absence, prior to any discussion with parents.

If any staff member suspects that a child has emerging or complex needs, or that there are child protection concerns, further information about abuse and neglect can be found in the policy appendices.

There may be occasions where a staff member has a gut feeling or instinctive concern even without clear evidence. For example:

- A pupil's appearance, mood, or behaviour has changed.
- Attendance has declined, or they frequently arrive late.
- A pupil seems distracted, distressed, or unusually quiet.
- You notice physical indicators that are concerning, but not conclusive.

In these situations, it is appropriate to engage sensitively, offering the child a chance to talk. It is acceptable to ask if they are *okay* or if you can help in any way.

These concerns should still be recorded and shared with the DSL, even if they seem minor or inconclusive.

Kirklees family help:
https://thrivingkirklees.org.uk

If Information is Disclosed to Our Staff

It takes a lot of courage for a child, parent, carer, or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the abuser may have threatened what will happen if they tell, they may have lost trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child or adult talks to a member of staff about any risks to a pupil's safety or wellbeing, they will need to let them know that they must pass the information on — they are not allowed to keep secrets. The point at which they do this is a matter of professional judgement.

Any member of staff who has concerns disclosed to them should always reassure the victim that they are being taken seriously and that they will be supported. The adult should never give the impression that they are creating a problem by reporting abuse, sexual violence, or harassment.

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During a Conversation with the Child or Adult:

- Allow them to speak freely. Listen without interruption and without asking leading questions.

- Keep questions to a minimum and use open-ended prompts, e.g. *"Can you tell me what happened?"* rather than *"Did X hit you?"*
- Remain calm and do not overreact — the child or adult may stop talking if they feel they are upsetting you.

- Offer reassurance through gentle words such as: *"I'm so sorry this has happened"*, *"I want to help"*, *"This isn't your fault"*, *"You are doing the right thing in talking to me."*

- Do not be afraid of silences — remember how difficult this may be for the child or adult.

- **Under no circumstances** ask investigative questions (e.g. *"How many times?"*, *"Does it happen to your brother?"*, *"What do your parents think?"*).

- At an appropriate time, explain that to help them, you **must pass this information on**.

- Do not automatically offer physical comfort touch may be distressing for someone who has experienced abuse.

- Avoid expressing shock or disappointment (e.g. *"I wish you'd told me sooner"*, *"I can't believe this"*), this may make them feel they've done something wrong.

- Explain what will happen next. They may agree to go with you to see the Designated Safeguarding Lead (DSL), or you may let them know someone will contact them before the end of the day.

- Communicate to the DSL and complete the safeguarding record on the school secure system. Seek support if you feel distressed.

If you are unsure at any stage, you must speak with the DSL to agree the best way forward.

Staff must immediately inform the DSL (using the safeguarding record on the school secure system) if there is:

- Any suspicion that a child is injured, marked, or bruised in a way that is not consistent with normal play.

- Any explanation given which appears inconsistent, vague, or suspicious.

- Any behaviour that gives rise to suspicion that a child may have suffered harm.

- Any concern that a child may be suffering from inadequate care, ill-treatment, or emotional maltreatment.

- Any concerns that a child is presenting signs or symptoms of abuse or neglect.

- Any significant changes in a pupil's presentation, including non-attendance.

- Any hint or disclosure of abuse about or by a child or young person.

- Any concerns regarding individuals who may pose a risk to pupils (e.g. living in the same household as children).
- Information indicating that a child is living with someone who does not have parental responsibility (private fostering).

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- Any concerns that a child is at risk of forced marriage, honour-based abuse, or female genital mutilation (FGM).

- Any concerns relating to homelessness.

Notifying Parents

We will normally seek to discuss any needs or concerns about a child with their parents or carers. This must always be handled sensitively. Where an family help assessment may benefit the child and their family, the most appropriate member of staff should approach the parent or carer to take this forward.

In situations where there are serious or complex needs, or child protection concerns, the DSL will contact the parent or carer. However, if TAO believes that notifying parents could increase the risk to the child, or exacerbate the problem, advice will be sought from Children's Social Care before any contact is made.

(Please see above reference to GDPR and disclosure.)

Getting Help for the Child

If a referral to Social Care is not considered appropriate, consideration will be given to the support the child and family may need. The school will consider what support can be offered internally and may undertake an family help Assessment to clarify the pupil's needs, strengths, and the support required, and/or make a referral for other services.

We have a clear system for recording all decisions made. Regular review of the pupil's needs may indicate that concerns should be escalated and a referral to an external agency may be required.

If the DSL and safeguarding team assess that the pupil's needs can be met from within the school, regular recorded updates of decisions will be placed on the pupil file.

Full written records of the information received by the DSL, including actions taken or not taken and the reasons for these, will be maintained.

Using the family help assessment

Where parents, carers, or pupils tell us that they require support, or staff identify emerging needs and that services may be required, an family help assessment is likely to be beneficial. In such cases, staff will have an open discussion with the parents, carers, and the child about the support and services that might help, and agree how these would be accessed.

Low Level Needs

Where the school and another service (e.g. GP) may be able to meet the needs, swift action should be taken to prevent those needs from escalating. The DSL will consider the appropriate Family Help or local support pathway and make or coordinate a referral where appropriate and request for support form should be completed to identify and document the child's needs. This process may indicate that a full Family Help Assessment is required, as well as the actions to be taken.

Kirklees Family Help:
https://thrivingkirklees.org.uk

Special Educational Needs and Disability

TAO recognises that there are sometimes additional barriers when recognising signs of abuse in children who have special educational needs or disabilities. *Part 1 Safeguarding Training (KCSIE)* covers this area and highlights to staff and volunteers the additional risks.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse, such as behaviour, mood, and injury, relate to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionately impacted by issues such as bullying, without outwardly showing any signs.
- Difficulties may arise in overcoming communication barriers.

In our school, we identify pupils who might need additional support to be kept safe or to keep themselves safe. Staff must not automatically attribute changes in behaviour, mood, presentation or injury to a pupil's SEND without appropriate exploration of whether abuse, neglect or another safeguarding concern may be present

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Emerging Needs

Where a child or parent is likely to require coordinated support from a range of family help services, or where there are concerns for a pupil's wellbeing, or their needs are unclear, unknown, or not being met, staff should discuss the use of the family help Assessment with the child and/or their parents or carers.

Where a multi-agency approach is required, a Team Around the Family (TAF) should be formed to bring together practitioners from the relevant services, so that they, alongside the family, can work together to meet the pupil's needs. Staff must not automatically attribute

changes in behaviour, mood, presentation or injury to a pupil's SEND without appropriate exploration of whether abuse, neglect or another safeguarding concern may be present

Referral to Children's Social Care

If it is believed that a child has complex or serious needs, or there are child protection concerns, the DSL will make a referral to Children's Social Care. Refer to threshold documents and safeguarding procedures (LA-specific) for guidance on making a referral.

Action following referral:

The DSL, or other appropriate member of staff, will:

- Follow up the referral in writing within **24 hours**, using any existing assessment (e.g. family help Assessment) or the Child Referral Form.
- Maintain contact with the allocated Social Worker.
- Contribute to any strategy discussions or meetings.
- Provide a report for, attend, and contribute to any initial or review Child Protection Conference.
- Share the content of this report with the parent and, if appropriate, the child, prior to the meeting.
- Attend core group meetings for any child subject to a Child Protection Plan, or Child in Need Plan.
- Where a child subject to a Child Protection Plan, Child in Need Plan, or who is Looked After moves from the school or goes missing, immediately inform the key worker in Social Care.
- Press for reconsideration if the pupil's situation does not appear to be improving (see LA-specific Escalation Policy).

Confidentiality, Sharing Information and Record Keeping

Data protection law provides a framework for lawful information sharing and must not be used as a reason to withhold information where sharing is necessary to safeguard a child Information will be shared in line with GDPR.

Decisions to share or not share safeguarding information, and the reasons for those decisions, should be recorded

Staff should only discuss concerns with the Designated Safeguarding Lead. The DSL will then decide who else needs to have the information and will disseminate it on a need-to-know basis.

Wherever possible, consent will be sought to share information. However, where there are safeguarding concerns about a child, information will be shared with the appropriate organisations, such as Children's Social Care. In most cases, concerns will be discussed with parents and carers prior to a referral, unless doing so would increase risk.

Record Keeping

To ensure all safeguarding concerns are managed effectively, TAO maintains a secure safeguarding recording system.

1. How Concerns Are Logged:

- All safeguarding concerns, disclosures, or incidents must be recorded promptly using the safeguarding record on the school secure system.
- Reports should include the exact words used by the child, observed behaviours, and any actions taken.
- Staff should not investigate but must refer concerns to the DSL immediately.

2. Confidentiality & Access:

- Records are stored securely, with access limited to DSLs, deputies, and relevant safeguarding professionals.
- Where necessary, records are shared with external agencies (e.g. Children's Social Care, Police, or safeguarding boards) in line with GDPR and statutory guidance.

3. Tracking & Review:

- The DSL regularly reviews safeguarding records to identify patterns, repeated concerns, or escalating risks.
- The safeguarding team meets regularly to evaluate interventions and ensure early support is provided.

4. Transition & Information Sharing:

- If a pupil moves to another education setting, safeguarding records are securely transferred within five school days.

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- As part of admission and transition, the DSL will seek relevant safeguarding and welfare information from the previous setting or professionals involved with the pupil. Where possible, a safeguarding handover will take place before or promptly following admission

- We ensure the receiving setting is aware of any safeguarding risks to continue appropriate support.

By maintaining clear, confidential, and secure safeguarding records, we help ensure that every child receives timely and appropriate support to keep them safe.

Records (electronic forms and paper records, securely filed on the school's OneDrive system) will include:

- A clear and comprehensive summary of concerns
- Details of how concerns were followed up and resolved
- Notes of any action taken, decisions reached, and resulting outcomes

Copies of these records will be securely sent to any school to which the child transfers within five days of transfer.

In addition to the child protection file, the DSL will also consider whether it is appropriate to share any additional information with the new setting in advance, to help ensure the right support is in place to safeguard the child.

Disclosure

TAO may share data with other agencies such as the Local Authority, funding bodies, and voluntary agencies.

- The individual will be made aware, in most circumstances, how and with whom their information will be shared. However, there are circumstances where the law allows TAO to disclose data (including sensitive data) without the data subject's consent.

These include:

- Carrying out a legal duty or as authorised by the Secretary of State.

- Protecting the vital interests of an individual, service user, or other person.

- The individual or service user has already made the information public.

- Conducting any legal proceedings, obtaining legal advice, or defending any legal rights.

- Monitoring for equal opportunities purposes (e.g. race, disability, religion).

- Providing a confidential service where the individual's consent cannot be obtained or it is reasonable to proceed without consent, for example, to avoid placing undue stress on an unwell or vulnerable person.

- TAO regards the lawful and correct treatment of personal information as vital to effective working and to maintaining the confidence of those with whom we engage.

- TAO will ensure that personal information is treated lawfully and correctly. To this end, TAO will adhere to the Principles of Data Protection, as set out in the Data Protection Act 2018 and UK GDPR.

Support for Those Involved in a Safeguarding/Child Protection Issue

Child neglect and abuse can be devastating for the child, and may result in distress or anxiety for staff who become involved. We will support pupils, their families, and staff by:

- Taking all suspicions and disclosures seriously.

- Nominating a link person who will keep all parties informed and act as the central point of contact.

- Where a member of staff is the subject of an allegation made by a child, nominating a separate link person to avoid any conflict of interest.

- Responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety.

- Maintaining confidentiality and sharing information strictly on a **need-to-know basis** with relevant individuals and agencies.

- Storing records securely.

- Offering details of helplines, counselling, and other external support services.

- Following the procedures laid down in our whistleblowing, complaints, and disciplinary policies.

- Cooperating fully with relevant statutory agencies.

Safer Recruitment

TAO follows the pre-appointment checking and safer recruitment arrangements set out in the Safer Recruitment Policy and Keeping Children Safe in Education 2026. The school maintains an up-to-date Single Central Record of the checks required by the Independent School Standards

We complete a full range of checks to minimise the possibility of pupils and young people suffering harm from those they consider to be in positions of trust.

We ensure that all appropriate measures are applied in relation to everyone who works in the school, including volunteers and staff employed by contractors. This is an essential part of creating a safe environment for pupils and young people.

Safer practice in recruitment means considering child protection and safeguarding at every stage of the recruitment process. This includes obtaining and scrutinising comprehensive information about applicants, such as:

- Professional references.
- Verification of academic or vocational qualifications.
- Previous employment history.
- Resolving any discrepancies or anomalies in references.

Everyone who works in the provision, including volunteers, will have the appropriate enhanced Disclosure and Barring Service (DBS) checks.

See DBS Policy Statement and Safer Recruitment Policy.

Safeguarding Concerns, Low-Level Concerns & Allegations (KCSIE 2026)

At TAO safeguarding is the responsibility of every member of staff. All concerns, regardless of perceived severity, must be acted upon promptly. The school promotes a culture of openness and reflection where staff feel confident to raise, record, and discuss concerns about conduct, professional boundaries, or behaviour that may pose a risk to pupils or colleagues.

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This section outlines procedures for:

1. **Low-Level Concerns**
2. **Allegations Against Staff (meeting the harm threshold)**
3. **Whistleblowing and Escalation**

1. Low-Level Concerns

TAO Independent School promotes a reflective safeguarding culture in which even minor concerns are shared and recorded. Early reporting prevents escalation and helps maintain safe, professional practice. Staff are encouraged to self-refer where they have found

themselves in a situation which could reasonably be misinterpreted, or where they believe they may have acted in a way that falls below expected professional standards

Definition:

A low-level concern is any concern about a member of staff, volunteer, or contractor's behaviour towards a pupil that does not meet the threshold of harm, but is inconsistent with the staff code of conduct. Examples include over-familiarity, blurred boundaries, or behaviour that could be misinterpreted by others. Examples may also include being alone with a pupil unnecessarily without good reason; inappropriate photography; or humiliating a pupil, including where intended as humour.

Reporting Process:

- Staff report low-level concerns directly to the Designated Safeguarding Lead (DSL).
- If the concern relates to the DSL, report directly to the Proprietor.
- Staff report low-level concerns directly to the Headteacher/DSL. If the concern relates to the Headteacher/DSL, it must be reported to the Proprietor. Where a safeguarding concern relates to the Proprietor, staff must follow the appropriate external safeguarding route, including referral to the LADO where appropriate).
- The DSL records each concern in a confidential Low-Level Concerns Log.
- The DSL reviews low-level concerns to identify patterns or escalating risk and shares appropriate safeguarding assurance with the Proprietor.
- Where a complaint concerns the Headteacher/Proprietor, the complaint to be made to Local Authority Designated Officer (LADO) where the complaint relates to safeguarding

Purpose:

Low-level concern systems are designed for learning, not blame. They encourage staff to reflect on professional boundaries, seek guidance, and protect both pupils and colleagues through transparency and accountability.

2. Allegations Against Staff (KCSIE 2026)

When a safeguarding allegation meets the harm threshold, the procedures in Keeping Children Safe in Education (2026), are followed.

Definition:

An allegation is made when someone who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child.

- Possibly committed a criminal offence against or related to a child.
- Behaved in a way that indicates they may not be suitable to work with children.

Reporting Process:

- Concerns regarding a member of staff, volunteer, contractor or trainee teacher are reported to the Headteacher/DSL.
- Concerns regarding the Headteacher are reported to the Proprietor.
- Where a safeguarding concern relates to the Proprietor, staff must follow the appropriate external safeguarding route, including referral to the LADO where appropriate

- The LADO determines whether the case meets the threshold for formal investigation.
- Staff are encouraged to self-refer where they have found themselves in a situation which could reasonably be misinterpreted, or where they believe they may have acted in a way that falls below expected professional standards

Records:

- Allegations are recorded confidentially and stored securely, separate from personnel files.
- The Proprietor retains oversight of all allegations to ensure procedural fairness and compliance.
- **3. Whistleblowing and Escalation**
- All staff, volunteers, and contractors have the right and duty to raise concerns about unsafe practice, misconduct, or failure to follow safeguarding procedures.
- Whistleblowing concerns can be raised with the Headteacher or DSL.
- Where a complaint concerns the Headteacher/Proprietor, it will be referred immediately to the Local Authority Designated Officer (LADO) where the complaint relates to safeguarding
- Where internal reporting is not appropriate, staff may contact the NSPCC Whistleblowing Helpline (0800 028 0285) or the Local Authority Designated Officer (LADO).

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- TAO operates a no-detriment policy: staff who raise genuine concerns will not suffer victimisation or adverse consequences.

4. Flow of Reporting Concerns (Summary):

Staff observes a concern or behaviour of note.

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Determine the type of concern: Where there is immediate danger to life or an immediate risk of serious harm, staff must contact emergency services where necessary and alert the DSL/DDSL immediately. The concern and action taken must then be recorded promptly on the school's safeguarding recording system." Emergency action comes before paperwork

Low-Level → Report to DSL → Logged → Reviewed termly

Allegation (harm threshold met) → DSL → LADO within 1 working day

Whistleblowing → DSL or external helpline

↓

DSL maintains secure record

↓

Proprietor receive summary oversight

Cross-References

This section should be read in conjunction with:

- Staff Code of Conduct & Wellbeing Framework (2026)
- KCSIE 2026, Part 4
- Safeguarding Policy (2026)
- Whistleblowing Policy (2026)

Where a complaint concerns the Headteacher/Proprietor, it will be referred immediately to the Local Authority Designated Officer (LADO) where the complaint relates to safeguarding

Concerns about Safeguarding / Whistleblowing

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. We encourage all staff to raise any such issues with the Proprietor/ Headteacher at the earliest possible opportunity. In addition, the school's Whistle-blowing Policy is available to staff who have concerns in this area.

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A whistleblowing disclosure must be about something that affects the general 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.

The National Society for the Prevention of Cruelty to Children (NSPCC) runs a whistle-blowing helpline on behalf of the government: **0800 028 0285**.

The DSL should inform the reporting person of any outcomes or updates. The reporting person can always approach the DSL for this information. If the reporting person is dissatisfied with the outcomes, they can approach the relevant Authority Department or the Local Authority Designated Officer (LADO) individually.

Deputy DSL – SENDCO@taoeducationgroup.co.uk **03301070050**)
Mental Health Lead / Team – headteacher **headteacher@taoeducationgroup.co.uk 03301070050**

NSPCC dedicated helpline numbers: 0808 800 5000

If the issue relates to educational services then it is a LADO matter; if it is outside education then contact Social Services.

LADO Kirklees
Tel: 01484 221126, Email: lado.cases@kirklees.gov.uk

Remember:

- **Ask no leading questions.** Be supportive and attentive.
- **Make no promises** to keep the information secret or to yourself.
- **All reports must be completed using the exact words** the young person uses — including swear words, slang, or offensive language.

TAO does not use restrictive physical intervention as a behaviour-management strategy. Where physical intervention is necessary to prevent immediate harm, it must be lawful, reasonable and proportionate and undertaken in accordance with the Behaviour Management Policy

Appendix 1

Indicators of abuse and neglect

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues overlap.

Abuse

- Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing ill-treatment of others (including Domestic abuse).

- Children may be abused in a family, institutional, or community setting, by those known to them, or more rarely, by strangers. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adults or by other children.

- Domestic abuse TAO Independent School will participate in Operation Encompass once the school's registration is complete and the necessary local arrangements are in place. The Headteacher/DSL will act as the school's Operation Encompass Key Adult

Physical Abuse

- Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

- Physical harm may also be caused when a parent or carer fabricates or induces illness in a child.

- Physical abuse can happen in any family, but children may be more at risk if parents have substance misuse, mental health issues, or domestic abuse. Babies and disabled children are particularly vulnerable.

Possible indicators of physical abuse:

- Frequent injuries.
- Unexplained or unusual fractures or broken bones.
- Unexplained bruises or cuts.
- Burns or scalds.
- Bite marks.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, which can have severe and long-lasting effects on their emotional development.

It may involve conveying to a child that they are worthless, unloved, or inadequate, or only valued insofar as they meet the needs of another.

It may include:

- Not giving the child opportunities to express their views.

- Deliberately silencing them or mocking communication.

- Imposing developmentally inappropriate expectations.

- Overprotection or limitation of exploration.

- Preventing social interactions.

- Exploitation or corruption.

- It may also involve serious bullying (including cyberbullying), making children feel frightened or in danger.

- Some degree of emotional abuse is present in all types of maltreatment, although it may occur alone.

Possible indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing things wrong.

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- Parents or carers who withdraw attention (‘cold shoulder’).
- Parents or carers blaming the child for their problems.
- Parents or carers humiliating the child (name-calling, negative comparisons).

Potential Vulnerabilities Linked to Exploitation

Note: These vulnerabilities increase risk but do not mean a child will be exploited. Child sexual exploitation can occur without any of these indicators.

- Prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe or stable home environment (domestic violence, parental substance misuse, mental health issues, or criminality) Children can be victims of domestic abuse in their own right, including where they see, hear or experience the effects of domestic abuse TAO Independent School will participate in Operation Encompass once the school’s registration is complete and the necessary local arrangements are in place. The Headteacher/DSL will act as the school’s Operation Encompass Key Adult
- Recent bereavement or loss.
- Social isolation or social difficulties.
- No safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other exploited children.
- Family involvement in adult sex work.
- Physical or learning disability.
- Being in care (especially residential or with interrupted history).
- Sexual identity.

Possible Indicators of Sexual Abuse

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. Children are more likely to be abused by someone they know than by a stranger. A child under 13 can never legally consent to sexual activity.

- Children who display knowledge or interest in sexual acts inappropriate to their age.
- Sexual language or knowledge beyond expected age.
- Asking others to behave sexually or play sexual games.
- Physical signs soreness in genital or anal areas, sexually transmitted infections, underage pregnancy.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities such as involving children in the production of sexual images, forcing them to view sexual content, encouraging sexually inappropriate behaviour, or grooming a child for future abuse (including online).

CSE can occur over time or as a one-off incident, and may take place without the child's immediate knowledge, for example through others sharing videos or images of them online.

CSE can affect any child, including those aged 16 and 17 who can legally consent to sex. Some children may not recognise they are being exploited, believing they are in a genuine romantic relationship.

Possible indicators of CSE include:

- Going missing for periods of time or regularly returning home late.
- Regularly missing school or not engaging in education.
- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Mood swings or changes in emotional wellbeing.
- Drug or alcohol misuse.
- Displaying inappropriate sexualised behaviour.

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Many children and young people who are victims of sexual exploitation do not recognise themselves as victims.

Types of child sexual exploitation:

Inappropriate relationships:

Usually involves one abuser who has power or control over a young person. The child may believe they are in a genuine relationship or friendship.

Boyfriend–girlfriend exploitation:

The abuser initially builds trust, appearing caring and supportive, sometimes giving gifts or attention. A seemingly consensual sexual relationship develops, which later becomes coercive or abusive. The victim may be forced to attend parties or engage in sexual activity with others and threatened if they try to seek help.

Organised exploitation and trafficking:

Victims are moved between locations by criminal networks and forced or coerced into sexual activity with multiple individuals. They may also be used to recruit new victims. This may involve the buying or selling of children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and emotional needs, likely to result in serious impairment of their health or development. It may occur during pregnancy due to maternal substance misuse.

Once born, neglect may involve failing to provide adequate food, clothing, and shelter (including exclusion or abandonment), failing to protect from harm, ensuring inadequate supervision, or failing to provide appropriate medical care. It may also include unresponsiveness to a child's emotional needs.

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Neglect may occur if a parent becomes physically or mentally unable to care for a child. Parents who misuse alcohol or drugs may prioritise their substance use over basic care needs.

Children who are neglected often suffer other forms of abuse. Practitioners must remain alert and take timely action even if the signs are not straightforward.

Possible indicators of neglect include:

- Children living in a home that is indisputably dirty or unsafe.
- Children who are consistently hungry or dirty.

- Children without adequate clothing, e.g. no winter coat.
- Children living in dangerous conditions, e.g. around drugs, alcohol, or violence.
- Children who are frequently angry, aggressive, or who self-harm.
- Children who do not receive basic health care.
- Parents who fail to seek medical treatment when children are ill or injured.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle theft, threatening or committing serious violence towards others.

Children can become trapped in exploitation because perpetrators may threaten them or their families with violence or coerce them into debt. They may also be forced or persuaded to carry weapons, such as knives, either for offending or because they believe it gives them protection.

Children involved in criminal exploitation often commit offences themselves. As a result, their vulnerability as victims is not always recognised by professionals, especially for older children, and they may not be treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

The experiences of girls who are criminally exploited may be different to those of boys. The indicators may not be the same, so professionals should remain alert to exploitation in both genders. Both boys and girls involved in criminal exploitation may also be at higher risk of sexual exploitation.

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Possible indicators of CCE include:

- 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 wellbeing.
- Children who misuse drugs or alcohol.
- Children who go missing for periods of time or regularly return home late.

- Children who regularly miss school or show poor engagement in education.

Child Criminal Exploitation: County Lines

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 areas within the UK, using dedicated mobile phone lines or other “deal lines”.

Exploitation is an integral part of the county lines model. Children and vulnerable adults are exploited to move and store drugs and money. Offenders often use coercion, intimidation, violence, including sexual violence, and weapons to ensure compliance.

Children are targeted and recruited from a range of settings, including schools, further and higher education institutions, pupil referral units, special educational needs settings, children’s homes, and care homes. They may be exposed to techniques such as “plugging”, where drugs are concealed internally to avoid detection.

Children can easily become trapped in this exploitation as county lines gangs create drug debts and may threaten serious violence or kidnap towards the victim and their family if they try to leave.

One way to identify involvement in county lines is through missing episodes (from home or school), when a child may have been trafficked for the purpose of drug transport. In such cases, referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be made, and local services and third sector providers who support victims of county lines exploitation should be considered.

Further information on the signs of involvement in county lines is available in Home Office guidance.

Key Characteristics of County Lines Exploitation:

- Can affect any child or young person (male or female) under the age of 19 years.
- Can affect any vulnerable adult over the age of 19 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force, coercion, enticement, or threats of violence.
- Can be perpetrated by individuals or groups, male or female, adults or young people.
- Is typified by some form of power imbalance, often due to age, gender, cognitive ability, physical strength, status, or access to resources.

Further Guidance – Categories and Resources

Abuse

- What to do if you are worried a child is being abused – DfE advice.
- Domestic abuse: Information and guidance – Home Office.
- Faith-based abuse: National Action Plan – DfE advice.
- Relationship abuse: Disrespect Nobody – Home Office.
- Tackling Child Sexual Abuse Strategy – Home Office policy paper.
- Together We Can Stop Child Sexual Abuse – HM Government campaign.
- Children can be victims of domestic abuse in their own right, including where they see, hear or experience the effects of domestic abuse TAO Independent School will participate in Operation Encompass once the school's registration is complete and the necessary local arrangements are in place. The Headteacher/DSL will act as the school's Operation Encompass Key Adult

Bullying

- Preventing bullying, including cyberbullying – DfE advice.

Children Missing from Education, Home or Care

- Children missing education – DfE statutory guidance.
- Child missing from home or care – DfE statutory guidance.
- Children and adults missing strategy – Home Office strategy.

Children with Family Members in Prison

- National Information Centre on Children of Offenders – Barnardo's in partnership with HM Prison and Probation Service.

Child Exploitation

- Trafficking: Safeguarding children – DfE and Home Office guidance.
- Care of unaccompanied and trafficked children – DfE statutory guidance.
- Modern slavery: How to identify and support victims – Home Office statutory guidance.

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Drugs

- Drug strategy 2017 – Home Office strategy.
- Information and advice on drugs – Talk to Frank.
- Drug and Alcohol Education – Teacher guidance and evidence review – PSHE Association.

Honour-Based Abuse, including FGM and Forced Marriage

- Female genital mutilation: Information and resources – Home Office guidance.

- Female genital mutilation: Multi-agency statutory guidance – DfE, DH and Home Office.
- Forced Marriage Unit (FMU) statutory guidance – fmu@fcdo.gov.uk

Health and Wellbeing

- Fabricated or induced illness: Safeguarding children – DfE, DH, Home Office.
- Rise Above: Free PSHE resources on health, wellbeing, and resilience – Public Health England.
- Supporting pupils with medical conditions – DfE statutory guidance.
- Mental health and behaviour – DfE advice.

Homelessness

- Homelessness: How local authorities should exercise their functions – Ministry of Housing, Communities and Local Government guidance.

Private Fostering

- Private fostering: Guidance for local authorities – DfE statutory guidance.

Radicalisation

Staff remain alert and aware to radicalisation through online and algorithm-driven content, including AI-generated extremist material, right-wing extremism and misogyny-driven radicalisation

- Prevent duty guidance – Home Office.
- Prevent duty: Additional advice for schools and childcare providers – DfE advice.
- Educate Against Hate – DfE and Home Office advice.
- Prevent for FE and Training – Education and Training Foundation (ETF).
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Violence

- Serious violence strategy – Home Office.
- Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office.
- Youth Endowment Fund – Home Office.
- Gangs and youth violence: Guidance for schools and colleges – Home Office advice.
- Ending violence against women and girls 2016–2020 strategy – Home Office.
- Violence against women and girls: National expectations for victims – Home Office guidance.
- Sexual violence and sexual harassment between children in schools and colleges – DfE advice.

Cross-References / Related Policies

Staff Code of Conduct; Whistleblowing Policy; Safer Recruitment Policy; Behaviour Management Policy; E-Safety Policy; Prevent Policy; Anti-Bullying Policy; Attendance & Punctuality Policy; First Aid & Medication Policy; Equality, Diversity & Equal Opportunities Policy; RHSE Policy; Complaints Policy

Version Updates

Version	Date	Author	Review / Changes	Approved By
3.2	07/09/2026	Daniel Giblin	Published	Proprietor

Updated for KCSIE 2026 and Working Together to Safeguard Children 2026; safeguarding leadership structure updated; Family Help terminology introduced; online and AI harms, child-on-child abuse, serious violence, mental health, filtering and monitoring, information sharing and staff-concern arrangements updated." / Approved by Proprietor

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