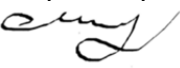


OMG Education

Safeguarding and Child Protection Policy

Including Online Safety, Filtering & Monitoring, and Low-Level Concerns

Policy version: March 2026 (Merged + F&M Edition)	Statutory framework: KCSIE 2025 Working Together 2023 ISS 2014
Last reviewed: June 2026	Next review due: September 2026, or sooner following any serious safeguarding incident, statutory update, or significant change in school practice.
Local authority: Tower Hamlets	Approved by: Headteacher and Governing Body

Headteacher / DSL	Victoria Early 	Date: 16/06/2026
Approved on behalf of the Governing Body by the Chair of Governors:	Gary Macey 	Date: 16/06/2026

This policy must be read by all staff, including supply, temporary and agency staff. All staff must sign to confirm they have read, understood and will apply it. A copy is available on the school website and on request from the school office.

1. Key Contacts at OMG Education

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Victoria Early	07388 174 363 v.early@omg.school
Deputy DSL (Raine's Building)	Yamna Saeed	07741 295 284 y.saeed@omg.school
Deputy DSL	Luke McCormick	0208 159 3838 l.mccormick@omg.school
Deputy DSL	Manasse Owoo	0208 159 3838 m.owoo@omg.school
Deputy DSL	Nadine Bradley	07818 289 352 n.bradley@omg.school
Deputy DSL (Raine's Building)	Jason Caicedo	0208 159 3838 j.caicedo@omg.school
First point of contact — all concerns	Victoria Early	07388 174 363 v.early@omg.school
LAC / PLAC Designated Teacher	Victoria Early	07388 174 363 v.early@omg.school

Local Authority and Statutory Contacts – Tower Hamlets

Multi-Agency Support Team (MAST)	Phone: 020 7364 5006, Option 2 or 3
You must complete the MAST request for support form to make a referral.	Extension: 5606 / 5601 / 5358 / 7796 / 3342 / 7828 / 6469 / 3181
Monday to Friday, 9 am to 5 pm (excluding bank holidays). For urgent concerns outside of office hours, call our Emergency Duty Team at 020 7364 4079 (after 5 pm and at weekends)	Email: MAST@towerhamlets.gov.uk
Emergency Duty Team (out of hours)	020 7364 4079
Police Child Abuse Investigation Team (CAIT)	020 8217 6484 (or use 999 if not available)
Local Authority Designated Officer (LADO)	020 7364 0677 07903 238827
Contact Melanie Benzie for allegations against professionals, staff, or volunteers.	LADO@towerhamlets.gov.uk
Police emergency	999
Children's Social Care Emergency Out-of-Hours Duty Team (5.00 pm onwards)	020 7364 5006 (Select option 3)
NSPCC Whistleblowing Helpline	0800 028 0285
DBS Barring referrals	03000 200 190

2. Introduction and Aims

OMG School is an independent special school for pupils aged 11–18 with complex special educational needs and disabilities (SEND), including autism, communication differences, learning disabilities, sensory needs, social, emotional and mental health (SEMH) needs and trauma histories. We are registered with the Department for Education and are subject to the Education (Independent School Standards) Regulations 2014, Part 3 of which sets out the standards for the welfare, health and safety of pupils.

OMG School fully recognises its responsibility under Section 175 of the Education Act 2002 and the Independent School Standards 2014 to safeguard and promote the welfare of children. Safeguarding is everybody's responsibility. Every member of staff, governor, volunteer and contractor has a duty to act on concerns.

This policy is written in accordance with:

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children (WT) 2023
- The Education (Independent School Standards) Regulations 2014
- Children Acts 1989 and 2004
- Education Act 2002 (s175 and s157)
- Equality Act 2010 and Public Sector Equality Duty
- Human Rights Act 1998
- UK GDPR and Data Protection Act 2018
- Counter-Terrorism and Security Act 2015 (Prevent duty)
- SEND Code of Practice 2015 and Children and Families Act 2014
- Tower Hamlets Safeguarding Children Partnership (THSCP) procedures and local thresholds

Aim

OMG School will ensure timely action to safeguard and promote children's welfare; that all staff understand their statutory responsibilities; and that safeguarding is a whole-school approach embedded across culture, curriculum, systems, and the physical environment, including online safety, filtering, and monitoring on school devices and networks.

3. Definitions

Safeguarding and promoting the welfare of children means: protecting children from harm; preventing impairment of children's mental and physical health or development; ensuring children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes. This includes protection from abuse online, in the community, and in the home.

Child protection is the activity undertaken to protect specific children who are suffering, or who are likely to suffer, significant harm.

A child is anyone under 18.

Early help means providing support as soon as a problem emerges. This can be provided at any point in a child's life, from the foundation years through to the teenage years.

4. Our School Context — Heightened Safeguarding for Pupils with SEND

The majority of pupils at OMG School have Education, Health and Care Plans (EHCPs), and many require multi-agency involvement. KCSIE 2025 recognises additional barriers that can exist for children with SEND when recognising abuse and neglect, including:

- Assumptions that indicators of abuse or neglect are linked to the child's SEND condition or behaviour, rather than harm (the 'diagnostic overshadowing' risk)
- Communication differences make it harder to disclose concerns or understand information provided to them
- Reliance on carers, making safeguarding in the home and care environment more complex
- Fewer friendships and peer support networks
- Greater likelihood of coming into contact with multiple adults, including professionals, carers and personal care support

We maintain heightened professional curiosity, provide accessible reporting routes, make reasonable adjustments to all procedures, including investigations, and maintain strong multi-agency collaboration. We do not dismiss or minimise any sign, indicator or behaviour as being simply a feature of a pupil's SEND.

5. Equality, Inclusion and Anti-Racism

We recognise that some pupils are at higher risk of harm. This includes children with SEND and health conditions, children who are absent from education, looked-after children, children with a social worker, and pupils who are or are perceived to be LGBTQ+. We comply with the Equality Act 2010 and the Public Sector Equality Duty.

5.1 Anti-Racism

OMG School is committed to being an actively anti-racist school. Racism in any form is a safeguarding concern because it causes harm and may indicate or contribute to abuse. KCSIE 2025 identifies prejudice-based and discriminatory abuse, including racism, as a safeguarding issue that staff must act on. We will:

- Treat racist behaviour — including slurs, harassment, microaggressions and stereotyping — as a safeguarding concern and record, investigate and respond appropriately
- Recognise that racism can intersect with SEND, communication differences and trauma, increasing vulnerability and barriers to disclosure
- Ensure staff do not minimise racism or explain it away as a misunderstanding or as behaviour related to disability
- Make reasonable adjustments so pupils can disclose racial harm using accessible communication methods
- Train staff to recognise and respond to discriminatory abuse, bias and adultification
- Challenge and escalate concerns where racial bias in another agency appears to affect safeguarding decisions

6. Roles and Responsibilities

6.1 All Staff

All staff (including supply, temporary, agency and ancillary staff) must:

- Read and understand KCSIE 2025 Part 1 (or Annex A if directed) before or at induction, and Annex B if working directly with pupils
- Know who the DSLs and deputy DSLs are and how to contact them
- Understand how to identify signs of abuse, neglect and exploitation and respond to a disclosure
- Complete safeguarding training at induction and receive regular updates at least annually
- Never promise confidentiality to a child
- Act immediately on any concern — not wait until a pattern is established
- Understand filtering and monitoring expectations and their role if an alert is triggered
- Complete the school's safeguarding induction sign-off and the annual update sign-off
- Must read, understand and confirm they will follow this policy at induction and as part of annual safeguarding updates.

6.2 Designated Safeguarding Lead (DSL)

The DSL is a senior leader with lead responsibility for safeguarding, child protection and online safety. The DSL's role is explicitly described in their job description, and they have the status and authority to carry out their duties. The DSL will:

- Make or oversee all referrals to Tower Hamlets MAST, police or other agencies
- Support staff to identify concerns early and take appropriate action
- Ensure records are maintained securely and transferred appropriately
- Have undertaken and keep up to date the two-day DSL training (at least every two years) and refresh knowledge annually through bulletins, meetings or further reading
- Hold oversight of filtering and monitoring, including reviewing alerts and supporting staff with responses
- Liaise with the Tower Hamlets LADO where an allegation against a staff member may meet the harm threshold
- Work with the proprietor and governing body to review and update this policy at least annually

The DSL can delegate activities to deputy DSLs, but the lead responsibility cannot be delegated. If the DSL and deputy DSLs are all unavailable, staff should speak to the most senior available member of staff and, if necessary, contact Tower Hamlets MAST directly for advice.

6.3 Proprietor and Governing Body

The proprietor and governing body will ensure:

- A senior member of the leadership team is appointed as DSL, and the role is explicit in their job description
- The DSL has sufficient time, training, resources and authority to fulfil the role
- All staff receive induction and regular safeguarding training

- This policy is reviewed at least annually, ratified by the governing body and published on the school website
- Appropriate filtering and monitoring systems are in place and reviewed at least annually
- A nominated safeguarding governor (Rhys Robotham) is appointed and trained
- The full governing body considers an annual safeguarding report
- Safer recruitment procedures, including DBS checks, are followed for all staff, contractors and volunteers
- Procedures for allegations, including low-level concerns, are implemented, and a safe culture is maintained
- The Governing Board receives termly safeguarding reports, including data on safeguarding concerns, referrals, staff training compliance and outcomes from safeguarding audits and quality assurance activities.
- The nominated Safeguarding Governor is Rhys Robotham. The Safeguarding Governor will undertake monitoring visits, review safeguarding records and systems, sample the Single Central Record with leaders, and report safeguarding oversight to the Governing Body at least annually.

6.4 Headteacher

The headteacher will implement this policy, ensure DSL cover is maintained at all times during school hours, act as case manager for allegations where appropriate, ensure safe recruitment procedures are followed and inform parents of safeguarding arrangements.

7. Recognising Abuse and Taking Action

All staff must maintain an attitude of 'it could happen here'. Indicators of abuse often overlap, and there may be no obvious signs. Staff should trust their instincts and act on concerns without waiting for certainty.

The four main categories of abuse are: physical abuse, emotional abuse, sexual abuse and neglect. Staff should also be alert to exploitation (including CSE and CCE), radicalisation, domestic abuse, forced marriage, honour-based abuse, FGM, modern slavery and trafficking. Full definitions are in Appendix A.

7.1 If a child is in immediate danger

Immediate danger — action required now

Call 999 immediately. Then contact Tower Hamlets MAST: 020 7364 5006. Inform the DSL as soon as possible. Anyone can make a referral and does not need to wait for DSL approval.

7.2 If a child discloses abuse or you have a concern

- Listen carefully and calmly. Do not interview the child, ask leading questions or promise confidentiality.
- Tell the child they have done the right thing and they will be taken seriously.
- Record what the child said, in their own words, as soon as possible after the conversation.
- Report to the DSL the same day.
- If the DSL is unavailable, report to a deputy DSL or the most senior available member of staff.
- If you believe a child faces a risk of significant harm and cannot reach any DSL or senior leader, contact the child's local authority MAST directly.

7.3 Early Help

Staff should consider whether a child may benefit from early help and support before a statutory intervention becomes necessary. The DSL will liaise with the child's local authority early help services. Staff should escalate without delay if concerns about early help persist or worsen.

8. Child-on-Child Abuse

Zero Tolerance

All forms of child-on-child abuse are unacceptable. It will never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Even if there are no reported cases, such abuse may still be happening and not being reported.

Child-on-child abuse can take many forms, including:

- Bullying, cyberbullying, prejudice-based and discriminatory bullying
- Physical abuse such as hitting, kicking, shaking, biting or hair pulling
- Sexual violence and sexual harassment (see section 9)
- Consensual and non-consensual sharing of nude or semi-nude images or videos
- Upskirting (Voyeurism (Offences) Act 2019)
- Causing someone to engage in sexual activity without consent
- Initiation and hazing-type violence and rituals
- Coercive and controlling behaviour within intimate partner relationships

Evidence shows girls are more likely to be victims and boys more likely to be perpetrators, but all child-on-child abuse is taken seriously regardless of gender, age or background. Pupils with SEND, LGBTQ+ pupils and pupils from minoritised groups may face heightened risk.

8.1 Minimising the risk

- We create a whole-school protective ethos in which child-on-child abuse is not tolerated
- Curriculum, RSHE and enrichment activities teach pupils about consent, healthy relationships and how to report concerns
- Staff training includes recognising indicators of child-on-child abuse and the gendered nature of peer harm
- Staff do not dismiss reports of abuse as inevitable or as part of growing up

8.2 Reporting systems — for pupils

Pupils can report concerns to any trusted adult. Reporting routes are accessible and adapted for pupils with SEND, including the use of visual supports, augmentative and alternative communication (AAC) and trusted key workers. The DSL will ensure that at least one accessible reporting route is always available to all pupils.

8.3 How allegations are investigated and how pupils are supported

When an allegation of child-on-child abuse is made:

- It is taken seriously and not dismissed as trivial

- The DSL leads the response, may consult child's local authority MAST or police, and decides on appropriate actions
- Risk assessment and safety planning are implemented to protect the victim, the alleged perpetrator and other pupils
- Victims are supported, and their wishes are taken into account in decision-making
- Both the victim and perpetrator are considered in terms of safeguarding needs
- Actions, decisions and rationale are recorded securely
- Parents are normally informed unless this would increase risk or compromise an investigation

9. Sexual Violence and Sexual Harassment Between Children

Sexual violence may include rape, assault by penetration and sexual assault. Sexual harassment refers to unwanted conduct of a sexual nature, which may include sexual comments or gestures, online sexual harassment, sharing of sexual imagery, and sexual coercion or threats.

The school will:

- Be clear that sexual violence and sexual harassment will not be tolerated
- Provide training for staff on managing reports of sexual violence or harassment
- Respond on a case-by-case basis, reassuring victims they are being taken seriously
- Implement safety measures to protect victims, alleged perpetrators and others
- Liaise closely with police and social care as required
- Refer to KCSIE 2025 Part 5 and DfE guidance on sharing nudes and semi-nudes (UKCIS)

10. Sharing of Nudes and Semi-Nudes

Staff must not view, copy or forward imagery unless strictly necessary to safeguard a child and only in line with DSL guidance and UKCIS advice. The DSL will lead the initial review, consider referral to police and/or social care, take steps to remove content where possible and record all decisions and rationale. Parents are normally informed, unless doing so would place the child at further risk.

11. Specific Safeguarding Issues

11.1 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE involves an individual or group using an imbalance of power to coerce, manipulate or deceive a child into sexual activity. CCE involves children being exploited to carry out criminal activity, including county lines drug supply. Both may appear consensual. Staff are trained to recognise indicators, including unexplained gifts, missing from education, changes in behaviour and associations with older individuals. The DSL will complete the THSCP exploitation risk assessment tool and refer to MAST where there is concern.

11.2 Domestic Abuse

Domestic abuse includes controlling, coercive or threatening behaviour between intimate partners or family members. Children living with domestic abuse are always affected. Staff are alert to indicators in children's behaviour, presentation or attendance. The school is aware of Operation Encompass and will act on any police notifications. Multi-Agency Risk Assessment Conference (MARAC) contributions are made as required.

11.3 Honour-Based Abuse (HBA), Female Genital Mutilation (FGM) and Forced Marriage

All forms of HBA are treated as abuse. FGM is illegal, and any known case must be reported to the police by the teacher with knowledge of it — this is a mandatory duty under the Female Genital Mutilation Act 2003 (as amended). The DSL must also be informed, and social care must be involved. Parents must not be told before advice is sought where FGM is suspected.

11.4 Radicalisation and the Prevent Duty

All staff receive Prevent awareness training. The DSL has completed Channel general awareness training. Concerns about radicalisation are referred to the DSL, who considers whether a Channel referral is appropriate, following the Tower Hamlets Prevent pathway.

11.5 Modern Slavery and Trafficking

Staff are alert to indicators of modern slavery, trafficking and criminal exploitation. Where a child may be a victim of modern slavery or trafficking, the National Referral Mechanism (NRM) process is explained to them, and a referral is considered. The DSL leads this process.

11.6 Serious Violence

All staff are aware of the indicators that a child may be at risk of or involved in serious violence, including involvement with gangs or county lines. Early help and referral to MAST are used as appropriate.

11.7 Mental Health

Staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of abuse. Mental health is addressed through pastoral support, curriculum and signposting to services. Staff do not attempt to diagnose but do report concerns to the DSL. Staff are trained to avoid pathologising distress as a feature of SEND where abuse or harm may be a factor.

11.8 Children Missing from Education (CME)

Persistent absence, repeated lateness, patterns of part-time attendance, unexplained absence and children missing education are treated as potential safeguarding concerns. Attendance information is monitored by leaders and the DSL, triangulated with welfare and safeguarding information, and escalated promptly where risk indicators are identified.

11.9 Private Fostering

Private fostering is when a child under 16 is cared for by someone who is not a parent or close relative for 28 days or more. We have a duty to notify Tower Hamlets of any such arrangements.

11.10 Children with Family Members in Prison

Children with a parent or close relative in prison may be at risk of poor outcomes. The school will work sensitively with families, maintain confidentiality and provide appropriate support.

11.11 Cybercrime

Staff are alert to indicators that pupils may be involved in cybercrime, either as victims or perpetrators. The DSL ensures that concerns are referred to appropriate agencies, including the police, where a crime may have been committed.

12. Pupils Who May Need Additional Safeguarding Support

12.1 Looked-After Children (LAC) and Previously Looked-After Children (PLAC)

All looked-after children at OMG School will have a designated teacher (Yamna Saeed) who supports their educational progress and is aware of their looked-after status and care arrangements. We:

- Work closely with social workers, virtual school heads and Independent Reviewing Officers (IROs)
- Ensure Personal Education Plans (PEPs) are completed, reviewed and actioned
- Use Pupil Premium Plus appropriately to support looked-after and previously looked-after children
- Recognise that previously looked-after children may remain vulnerable and maintain vigilance
- Notify social care immediately if a looked-after pupil is excluded, has an unexplained absence or has a change in circumstances

12.2 Children with a Social Worker

We proactively share information about welfare and safeguarding with the allocated social worker and contribute to assessments, child-in-need plans, and child protection plans. When a child with a social worker is absent without explanation, we immediately follow escalation procedures.

12.3 Young Carers

We seek to identify pupils who are young carers, provide additional internal support and signpost to external agencies as appropriate.

12.4 LGBTQ+ Pupils

We recognise that LGBTQ+ pupils and those perceived to be LGBTQ+ face higher risks of harm, including homophobic, biphobic, and transphobic bullying. Staff are trained to recognise and respond. We create a supportive environment in which all pupils are respected.

13. Online Safety, Filtering and Monitoring

We address online safety through policy, curriculum and systems, covering content, contact, conduct and commerce risks. The DSL has led oversight for online safety, filtering, and monitoring processes.

13.1 Named Roles for Filtering and Monitoring

Role	Name	Contact
Strategic responsibility and annual oversight	Jamal Miah	Proprietor
Operational safeguarding lead/oversight of alerts	Victoria Early	Headteacher and Designated Safeguarding Lead (DSL)

Deputy oversight when DSL is unavailable	Yamna Saeed	Deputy DSL
Technical administration and reporting	Waqas Riaz	Operations Director

13.2 Governing Body Duties for Filtering and Monitoring

The proprietor and governing body ensure that appropriate filtering and monitoring systems are in place on all school devices and networks. They review the effectiveness of these systems at least annually, document decisions on what is blocked or allowed, and ensure leadership and all staff understand their roles. See Appendices G–J for the Filtering and Monitoring Statement, Annual Review Log, Test Checks Log and Remote Learning AUP.

13.3 Generative AI

Only approved AI tools may be used by staff and pupils following risk and data protection impact assessments. Misuse is addressed under behaviour and online safety policies. Where AI has facilitated the creation of CSAM or deepfake abuse imagery, this is reported to the appropriate agencies immediately.

13.4 Mobile and Smart Technology

Clear, proportionate expectations on the use of mobile and smart devices are set out in the school's Mobile and Smart Technology Policy. Restrictions are accompanied by education promoting safe and respectful online behaviour.

13.5 Online Safety Training and Curriculum

All staff receive training on online safety, including an understanding of filtering and monitoring roles, at induction and through regular updates. Pupils receive inclusive online safety education adapted for SEND, covering recognising risks, reporting concerns and behaving safely and respectfully online.

14. Confidentiality and Information Sharing

UK GDPR and the Data Protection Act 2018 do not prevent information sharing for safeguarding purposes. The lawful bases for sharing include legal obligation and vital interests. We share information with those who need it to keep children safe, in line with KCSIE 2025, WT 2023 and the Tower Hamlets Information Sharing Protocol.

- Staff understand they have a professional responsibility to share information with other agencies to safeguard children
- Staff are clear with children that they cannot promise to keep secrets
- Information is shared on a 'need to know' basis, not widely
- Decisions to share or withhold information are recorded with a rationale
- Where a Subject Access Request is received, it is referred to the DSL or headteacher

15. Record Keeping

We keep clear, comprehensive, accurate and timely records of all safeguarding concerns, decisions and actions. Records include the date, events described in the child's own words where possible, and actions taken.

- Child protection files are held securely and separately from the main pupil file
- Electronic records are stored on the school's secure platform
- Child protection files are transferred to the receiving school within five days of a pupil's transfer, with confirmation of receipt
- The DSL considers sharing information in advance of a transfer where this supports the transition
- Parents are made aware that records exist unless to do so would place a child at risk
- Records are retained in line with the Education Safeguarding Team guidance on keeping and managing safeguarding records

16. Communicating with Parents and Carers

We will normally discuss concerns with parents/carers unless this would place a child at further risk, impede a police investigation or be otherwise inappropriate. The DSL seeks advice from MAST if unsure. For child-on-child incidents, information sharing with parents of both parties is handled in line with police and social care advice. All decisions and rationale are recorded.

17. Safer Recruitment

OMG School follows KCSIE 2025 Part 3 and maintains a Single Central Record (SCR) of all checks. Requirements include:

- Job advertisements that include a safeguarding statement
- Application scrutiny, gaps in employment and reference checks, including a safeguarding-specific reference
- Identity, right to work and enhanced DBS checks with barred list check where required
- Section 128 direction checks for management roles
- Online searches for shortlisted candidates
- Overseas checks where applicable
- At least one panel member on every interview panel holds safer recruitment training

The school ensures that all staff, contractors, and volunteers are checked before starting work and that the SCR is maintained, audited, and available for inspection. This policy should be read alongside the school's Safer Recruitment Policy.

18. Allegations Against Staff, Supply, Volunteers and Contractors

18.1 Concerns Meeting the Harm Threshold

Any allegation of abuse made against a member of staff, supply, volunteer or contractor that may meet the harm threshold (the person has: behaved in a way that has harmed or may harm a child; possibly committed a criminal offence against a child; or behaved in a way that indicates they may not be suitable to work with children) must be:

- Reported immediately to the Headteacher. If the allegation concerns the Headteacher, it must be reported immediately to the Proprietor, Jamal Miah.
- The headteacher (as case manager) must immediately contact the Tower Hamlets LADO: 020 7364 0677 / 07903 238827 | LADO@towerhamlets.gov.uk
- The LADO must be notified within one working day
- The staff member should not be interviewed or informed of the allegation until the LADO advises
- A referral to the DBS and, where applicable, the Teaching Regulation Agency (TRA) is made where a person is removed from working with children following an allegation

LADO — Tower Hamlets

Phone: 020 7364 0677 / 07903 238827 Email: LADO@towerhamlets.gov.uk Notification required within one working day of becoming aware of an allegation that meets the harm threshold.

18.2 Concerns Not Meeting the Harm Threshold (Low-Level Concerns)

A low-level concern is any concern that does not meet the harm threshold but indicates that an adult's behaviour towards a child has been, or may be, inappropriate. Examples include: overfamiliar language or conduct, sharing personal information with pupils, communication with pupils outside school channels, or poor boundaries.

Low-level concerns:

- Are encouraged to be reported to the headteacher or DSL as soon as possible
- Are recorded by the headteacher even if the concern is immediately resolved
- Are reviewed regularly to identify patterns or escalating risk
- Do not need to be reported to the LADO unless the pattern meets the harm threshold

All staff are supported and encouraged to speak up about any concern, including concerns about colleagues' conduct. Staff making a report in good faith will not be treated adversely for doing so. See also the Whistleblowing Policy.

18.3 Allegations Where School Premises Are Used by Other Organisations

Where an allegation arises relating to an incident that occurred while a third party was using school premises for children's activities, the school will follow safeguarding procedures and inform the LADO.

18.4 Staff Rights

Staff subject to an allegation have the right to a fair, timely and consistent process. Suspension is not automatic and will be used only when necessary to protect children or the integrity of an investigation. Disciplinary proceedings are concluded in full even if the staff member leaves during the process.

19. Restrictive Interventions, Including the Use of Reasonable Force

Staff may need to use restrictive interventions in limited circumstances to safeguard children and others from harm. We are committed to minimising the need through Positive Behaviour Support, early intervention and de-escalation. Any use of restrictive intervention will be:

- Lawful, necessary and proportionate
- For the shortest possible time
- Recorded fully and reviewed by leaders and governors
- Reported to parents unless this would increase risk or compromise an investigation

Particular care is taken with pupils with SEND and sensory or communication differences. Regular review of incidents helps identify patterns and inform training. See also the school's Positive Handling - Restrictive Interventions Policy (effective 1 April 2026).

20. Preventative Education — Curriculum, RSHE and Computing

We teach pupils, in ways adapted to their SEND and communication needs, about: consent and personal boundaries; healthy and unhealthy relationships; recognising abuse; online safety and digital citizenship; how to report concerns; and where to get help. RSHE is delivered sensitively and inclusively. Lesson content is shared with parents to reinforce skills at home.

21. Training and Induction

All staff receive safeguarding and child protection training at induction, including online safety, filtering and monitoring expectations and roles. Training is updated at least annually. DSLs train at least every two years and update their knowledge at least annually. Governors receive induction and refresher safeguarding training.

For agency and supply staff, a local safeguarding induction is completed on their first day on site, before they work directly with pupils, and includes this policy, the staff code of conduct, key contact details and how to report concerns.

22. Multi-Agency Working

We work in accordance with the Tower Hamlets Safeguarding Children Partnership (THSCP) procedures and local thresholds framework. We contribute to multi-agency assessments, child-in-need plans, and child protection plans. We allow access to the school for section 17 and section 47 enquiries. We support and attend core group meetings and child protection conferences.

23. Whistleblowing and Complaints

All staff and volunteers feel able to raise concerns about poor or unsafe practice without fear of reprisal. Internal routes include the DSL and the headteacher. Staff can also contact the local authority or the NSPCC Whistleblowing Helpline (0800 028 0285 | help@nspcc.org.uk). Parents can use the school's complaints procedure for safeguarding-related concerns.

24. Monitoring and Review

This policy is reviewed at least annually and updated whenever there are significant changes to statutory guidance, legislation, local procedures, lessons learned or school-specific arrangements. It is ratified by the governing body or proprietor and published on the school website or available by other means. Minor updates — such as changes to contact details — are made without delay.

Following significant safeguarding incidents, allegations, patterns of concern, or external review findings, the school will undertake a reflective review, identify lessons learned, and take action to strengthen policy, practice, training, and oversight.

25. Linked Policies and Procedures

This policy should be read alongside:

- Allegations Against Staff (Including Low-Level Concerns) Policy
- Anti-Bullying Policy
- Attendance Policy
- Positive Handling - Restrictive Interventions Policy
- Child-on-Child Abuse Policy
- Children Missing Education (CME) Policy
- Complaints and Compliments Policy and Procedure
- Data Protection - GDPR Policy
- Equalities (Equality Act 2010) Policy
- Filtering and Monitoring Policy
- First Aid Policy and Procedures
- Health and Safety Policy
- Intimate Care Policy
- E-Safety Policy
- ICT Acceptable Usage Policy
- Prevent Policy
- Relationships and Sex Education Policy
- Safer Recruitment Policy
- SEND Policy
- Guidance for Staff on Appropriate Conduct and Behaviour Policy
- Whistleblowing Policy

Appendix A. Categories and Indicators of Abuse

Staff should be familiar with the following definitions from KCSIE 2025 Annex B. Indicators often overlap and may not be obvious. Professional curiosity is essential.

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 symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Persistent emotional harm causes severe and adverse effects on a child's emotional development. It may involve conveying to children that they are worthless, unloved or inadequate. It may feature age-inappropriate expectations, serious bullying, seeing or hearing ill-treatment of another, or exploitation.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. This includes contact abuse and non-contact abuse, including online grooming and sexual exploitation.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Includes failure to provide food, clothing, shelter, medical care, appropriate supervision or emotional availability.

Exploitation (CSE and CCE)

Sexual exploitation involves the use of an imbalance of power to coerce or manipulate a child into sexual activity. Criminal exploitation includes recruiting children to carry out criminal acts. Both may appear consensual.

Domestic Abuse

Controlling, coercive or threatening behaviour between intimate partners or family members. Children are always affected. May be physical, psychological, financial, sexual or emotional.

Honour-Based Abuse, FGM and Forced Marriage

Committed to protect or defend perceived family or community honour. FGM is illegal. Staff have a mandatory duty to report known FGM in under-18s to the police.

Radicalisation and Extremism

The process by which individuals come to support terrorism or extremist ideologies. Indicators include changes in belief, language, associations and online activity.

Modern Slavery and Trafficking

Recruiting, transporting or harbouring persons by means of threat or coercion for exploitation.

Appendix B. Safer Recruitment Checks — Summary

Check	Requirement
Enhanced DBS	Required for all staff and volunteers in regulated activity

Barred list check	Required where a person is in a regulated activity
Section 128 direction	Required for management positions in independent schools
Identity and right to work	All staff — before appointment
Qualifications	Where relevant to the role
References	At least two, including safeguarding-specific questions — obtained before appointment
Online search	Shortlisted candidates — carried out and recorded.
Prohibition from teaching	All teaching staff — Teacher Services check
Overseas checks	Where the candidate has lived or worked abroad
Safer recruitment training	At least one panel member per interview panel

Appendix C. Allegations Against Staff — Process Overview

Stage	Action
Allegation received	Report immediately to the Headteacher. If the allegation concerns the Headteacher, report immediately to the Proprietor, Jamal Miah.
Within 1 working day	Headteacher consults LADO: 020 7364 0677 LADO@towerhamlets.gov.uk
LADO advice	Follow LADO guidance on investigation, suspension and communication.
Police / MAST	Refer if a criminal offence may have been committed or if a child is at risk.
Outcome definitions	Substantiated / Unsubstantiated / Malicious / False / Inconclusive
DBS/TRA referral	Where a person is removed from working with children, a referral is mandatory.
Record keeping	Secure, separate record; retained for the career length of the individual
Low-level concerns	Recorded by HT; reviewed for patterns; LADO consulted if threshold reached

Appendix D. Quick Reference Flowcharts

D1 — Concern about a child (not immediate danger)

1. Report to DSL immediately 2. If DSL is unavailable: speak to the deputy DSL or the most senior available staff member 3. If no senior staff are reachable, contact Tower Hamlets MAST for advice: 020 7364 5006. DSL decides: early help/monitoring/referral/police. Record rationale, actions and outcomes 6. Review and escalate if no improvement

D2 — Child at immediate risk of significant harm

1. Call 999 immediately 2. Contact Tower Hamlets MAST: 020 7364 5006 3. Inform DSL as soon as possible 4. Record all actions and rationale 5. Anyone can make a referral — do not wait for DSL approval

D3 — Allegation or low-level concern about staff, supply, volunteer or contractor

1. Report immediately to the Headteacher. If the allegation concerns the Headteacher, report immediately to the Proprietor, Jamal Miah.
2. Headteacher (as case manager) considers whether the harm threshold is met
3. If harm threshold met: consult LADO within 1 working day — 020 7364 0677
4. Do not investigate or interview the subject until advised by LADO
5. Manage under KCSIE 2025 Part 4
6. Record securely; consider DBS or TRA referrals at conclusion

Appendix E. Staff Safeguarding Quick Reference Card

Legal reading (required before or at induction)

Read KCSIE 2025 Part 1 (or Annex A if directed). Read Annex B if you work directly with pupils. Sign to confirm. Refreshed annually.

Immediate danger or significant harm

Call 999 and/or MAST (020 7364 5006) immediately. Inform DSL as soon as possible. Anyone can make a referral — do not wait. Record all actions taken.

Non-urgent concern

Tell the DSL straight away — same day. If unavailable, speak to a deputy DSL or SLT and take advice from MAST. Record facts the same day in the child's own words, where possible.

Key contacts

DSL: Victoria Early | Deputy DSL: Yamna Saeed | First point of contact: Victoria Early — 07388 174 363
MAST: 020 7364 5006 | LADO: 020 7364 0677 or 07903 238827 Emergency Duty Team: 020 7364 4079
| Police CAIT: 020 8217 6484 | Emergency: 999

Pupils with SEND

Do not assume behaviour, injuries, or distress are because of disability. Use visuals, simplified language and AAC where needed so pupils can report worries. Escalate to the DSL.

Child-on-child abuse

Zero tolerance — this includes prejudice-based bullying, sexual harassment or violence, sharing nudes or semi-nudes, upskirting and initiation. Report and record immediately.

Online safety/filtering

We have appropriate filtering and monitoring. The DSL leads oversight. If you see something, report it to the DSL immediately. Involve the police where a crime may have been committed.

Appendix F. KCSIE 2025 Compliance Matrix

KCSIE 2025 / ISS requirement	Where covered in this policy
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Whole-school safeguarding approach embedded across culture, curriculum and systems	Sections 2, 6, 13, 20, 24
Child-on-child abuse: zero tolerance, procedures, reporting systems for pupils, investigation, support	Section 8; Appendix D; Appendix E
Sexual violence and harassment: procedures, case-by-case response	Section 9
Sharing of nudes and semi-nudes: DSL-led, UKCIS-aligned	Section 10
Children with SEND — additional barriers recognised; no diagnostic overshadowing	Sections 4, 6.1, 12
Children at greater risk — LAC/PLAC, children with social workers, LGBTQ+, minority groups	Sections 12; Appendix E
Prejudice-based and discriminatory abuse, including racism	Section 5.1; Sections 8, 20
Online safety and filtering and monitoring: DSL oversight, annual governance review, staff training	Section 13; Appendices G–J
Generative AI safeguarding	Section 13.3
Safer recruitment: KCSIE Part 3, SCR, panel training	Section 17; Appendix B
Allegations: harm threshold, LADO, low-level concerns, safe culture	Section 18; Appendix C; Appendix D
Early help, local thresholds, referral and escalation; multi-agency working	Sections 7, 22; Appendix D
Attendance and children absent from education (CME)	Section 11.8
LAC/PLAC designated teacher, PEPs, virtual school head	Section 12.1
Information sharing: lawful basis, THSCP protocol, records	Sections 14–15
Training and induction: all staff, DSL cycle, governors	Section 21
Publication and annual review — governing body ratification	Section 24
ISS 2014 Part 3 — welfare, health and safety of pupils	Sections 2, 4, 6, 19

Appendix G. Filtering and Monitoring Statement

- Purpose: to explain how OMG School protects pupils and staff online on school devices and networks.
- Scope: all users of OMG School devices, platforms and networks, on-site and when accessing remotely.
- Systems in use: [Insert filtering system name and version]; [Insert monitoring solution or process].

- Coverage: applied to staff, pupils, supply and visitors using school networks; guest access is controlled and logged.
- Governance: proprietor reviews effectiveness at least annually; DSL provides safeguarding oversight; IT provides technical reports.
- Decisions: what is blocked or allowed is documented with rationale; any changes are logged and reviewed.
- Risk profile: filtering and monitoring decisions are informed by the needs of a special school cohort with complex SEND and higher online risk.
- Limitations: no system is 100% effective; education, supervision and clear reporting routes remain essential.

Appendix H. Annual Filtering and Monitoring Review Log

Complete at least annually and following any significant change. Retain the governing body minutes.

Review date	Attendees	Key decisions and rationale	Actions and owners	Status/notes

Appendix I. Filtering and Monitoring Test Checks Log

Log regular practical checks to evidence that filtering and monitoring operate as expected.

Check date	Performed by	Device/user type	Scenario/keyword tested	Expected result	Observed result	Actions taken

Appendix J. Remote and Online Learning Acceptable Use Policy (AUP)

- Use only school-approved platforms and accounts for remote learning and communication.
- Keep sessions to school-scheduled times. Do not initiate unscheduled one-to-one video calls with pupils unless agreed with the DSL or SLT and recorded.
- Use school backgrounds or neutral environments for video where possible. Dress professionally.
- No recording of live lessons by pupils or parents without prior written permission from the school.
- Safeguarding first. If you see or hear something that suggests a child is at risk, end the session safely and contact the DSL immediately. Record the facts.
- Language, behaviour and content must be professional and appropriate at all times.
- Data protection: only share the minimum personal data necessary. Store materials in the school systems. Do not download pupil data to personal devices.
- Pupils and parents agree to follow the Pupil AUP for behaviour online. Breaches will be dealt with in line with behaviour and safeguarding policies.

- Accessibility: teachers will provide reasonable adjustments and alternative formats for pupils with SEND and communication needs.