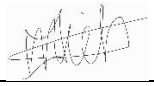
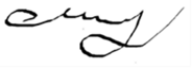
OMG School Kent
Safeguarding and Child Protection Policy

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

Policy version: 3.0 — September 2026 (replaces Issue 2, June 2026)	**Statutory framework:** KCSIE 2026 · Working Together to Safeguard Children 2026 · Independent School Standards 2014
Last reviewed: September 2026	**Next review due:** September 2027, or sooner after any statutory change, serious incident or significant change in practice
Local authority: Kent County Council	**Approved by:** Headteacher and Governing Body

Proprietor, Acting Headteacher and DSL	Jalmat Miah 	**Date:** 14/09/2026
Approved on behalf of the Governing Body by the Chair of Governors:	Gary Macey 	**Date:** 14/09/2026

This policy must be read by all staff, including supply, temporary and agency staff, volunteers and contractors. Everyone signs to confirm they have read, understood and will apply it. It is published on the school website and available on request from the school office.

Summary of changes in Version 3.0: updated to KCSIE 2026 (in force 1 September 2026) and Working Together 2026; Annex A references removed (all staff now read Part One in full); supervision exemption removed from regulated activity (Crime and Policing Act 2026); new sections on gender questioning children, self-harm and suicide risk, classroom removal and part-time timetables, and the forthcoming mandatory duty to report child sexual abuse; DSL cover and DSL-to-DSL transfer arrangements; an independent route where the proprietor is implicated; filtering checks every academic year; phone-free default; Children's Wellbeing and Schools Act 2026; house-style change to "students".

1. Key Contacts at OMG School Kent

Role	Name	Contact
Designated Safeguarding Lead (DSL) and first point of contact	Jalmat Miah (Proprietor and Acting Headteacher)	0749 833 0265| j.miah@omg.school
Deputy DSL	Yamna Saeed	0208 159 3838 | y.saeed@omg.school
Deputy DSL (Raine's Building)	Yamna Saeed	07741 295 284 | y.saeed@omg.school
First point of contact — all concerns	Jalmat Miah	0749 833 0265| j.miah@omg.school
Designated Teacher for looked-after and previously looked-after students	Yamna Saeed	07741 295 284 | y.saeed@omg.school
Chair of Governors	Gary Macey	0208 159 3838
Safeguarding Governor	Rhys Robotham	0208 159 3838

Local Authority and Statutory Contacts – Kent County Council

Integrated Front Door / Children's Social Care Concerns about the welfare of a child should be referred through the Kent **Integrated Children's Portal**. Professionals can make referrals online through the portal, and Kent County Council states that this is the route for reporting child abuse as a professional.	https://webapps.kent.gov.uk/KCC.ChildrensPortal.Web.Sites.Public/Default.aspx
Child welfare concerns during office hours	Phone: 03000 41 41 41
Emergency and out-of-hours contact	Phone: 03000 41 91 91
Immediate danger	Call **999** if a child is in immediate danger.
LADO / LESAS (allegations against staff, volunteers, or professionals) Referrals relating to allegations against a member of staff or volunteer should be made through the **Kent Integrated Children's Services Portal** using the LADO referral route. Kent's Local Authority Designated Officer function now sits within **LADO Education Safeguarding Advisory Service (LESAS)**.	https://webapps.kent.gov.uk/KCC.ChildrensPortal.Web.Sites.Public/Default.aspx
LADO / LESAS enquiries	Use the **LESAS enquiry form** for clarification on whether a LADO referral is needed, and for general education safeguarding or online-safety advice.
Urgent LADO / safeguarding calls	If a call is urgent and a child is in immediate danger, call **03000 41 11 11**. If urgent and outside office hours, call **03000 41 91 91**.
Police	Emergency: **999**. Non-emergency: **101**.
NSPCC Helpline	Phone: 0808 800 5000. Email: help@nspcc.org.uk.
DBS barring referrals	Phone: **03000 200 190**

2. Introduction and aims

OMG School Kent is an independent special school for students 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 meet the Education (Independent School Standards) Regulations 2014, Part 3 of which covers the welfare, health and safety of students. We are inspected by Ofsted as a non-association independent school.

We recognise our duties under section 157 of the Education Act 2002 and the Independent School Standards to safeguard and promote the welfare of children. Under the Children's Wellbeing and Schools Act 2026, education settings, including independent schools, are relevant partners in local safeguarding arrangements, and we take a full part in them. Safeguarding is everyone's responsibility: every member of staff, governor, volunteer and contractor has a duty to act on concerns.

This policy has regard to:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- Education (Independent School Standards) Regulations 2014
- Children Acts 1989 and 2004; Children's Wellbeing and Schools Act 2026
- Education Act 2002 (s157); Education and Skills Act 2008
- Crime and Policing Act 2026; Safeguarding Vulnerable Groups Act 2006
- Working Together to Improve School Attendance (statutory guidance)
- DfE statutory guidance on mobile phones in schools (from 1 September 2026)
- Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998
- UK GDPR, Data Protection Act 2018 and the Data (Use and Access) Act 2025
- Counter-Terrorism and Security Act 2015 and the Prevent duty guidance
- SEND Code of Practice 0–25 and Children and Families Act 2014
- THSCP procedures and local thresholds

Our aim. Every student is safe, feels safe and knows how to get help. Safeguarding is a whole-school approach built into our relational culture, curriculum, systems and environment, including online. We act early, we listen to every way a student communicates, and we never let a student's SEND explain away a sign of harm.

3. Definitions

Safeguarding and promoting the welfare of children means providing help and support to meet children's needs as soon as problems emerge; protecting children from maltreatment, whether inside or outside the home and including online; preventing impairment of children's mental and physical health or development; making sure children grow up in circumstances consistent with safe and effective care; and taking action so that all children have the best outcomes.

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

A child is anyone under 18. All our students are children for safeguarding purposes.

Family Help is the support offered as soon as a problem emerges, from universal services and community-based early help (including Best Start Family Hubs) through to targeted Family Help. Staff should know the difference between Family Help and a referral for a section 47 child protection enquiry.

4. Our context — heightened safeguarding for students with SEND

Most of our students have Education, Health and Care Plans, and many involve several agencies. KCSIE 2026 recognises additional barriers for children with SEND, including:

- assumptions that indicators of abuse are part of the child's condition or behaviour ("diagnostic overshadowing")
- communication differences that make disclosure harder, or that mean a child may not recognise abuse
- reliance on adults for intimate and personal care
- isolation, fewer friendships and peer support
- contact with many adults, including professionals and carers
- greater vulnerability to bullying, including online, without visible signs

We keep a high level of professional curiosity, provide accessible reporting routes, make reasonable adjustments to all procedures (including investigations), and work closely with other agencies. **We do not dismiss any sign, change or behaviour as "just part of" a student's SEND.**

5. Equality, inclusion and anti-racism

Some students are at greater risk of harm, including those with SEND or health conditions, children absent from education, looked-after children, children with a social worker, young carers, and students who are, or are perceived to be, LGBTQ+. We meet the Equality Act 2010 and have due regard to the Public Sector Equality Duty, including when we make referrals.

5.1 Anti-racism

OMG School Kent is an actively anti-racist school. KCSIE 2026 and Working Together 2026 recognise prejudice-based harm, including racism and faith-based prejudice, as a safeguarding matter, and expect professionals to challenge discrimination. We will:

- treat racist behaviour, including slurs, harassment, microaggressions and stereotyping, as a safeguarding concern and record, respond and follow up
- recognise how racism intersects with SEND, communication differences and trauma, increasing vulnerability and barriers to disclosure
- make sure staff do not minimise racism or explain it away as a misunderstanding or as disability-related behaviour
- make reasonable adjustments so students can disclose racial harm in the way they communicate best
- train staff to recognise discriminatory abuse, bias and adultification
- challenge and escalate 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 **KCSIE 2026 Part One in full** before or at induction (the condensed Annex A has been withdrawn), and sign to confirm
- know who the DSL and deputy are and how to reach them
- know how to identify signs of abuse, neglect, exploitation and harm to mental health, and how to respond to a disclosure
- complete safeguarding training at induction and updates at least annually
- never promise confidentiality to a child
- act immediately on any concern rather than waiting for a pattern
- record any removal of a student from the classroom, with the reason
- understand filtering and monitoring expectations and what to do if they see harmful content or an alert
- challenge inappropriate behaviour between students, including sexist and misogynistic language
- read, understand and follow this policy, confirming this at induction and at each annual update

6.2 Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team with lead responsibility for safeguarding, child protection and online safety, set out in their job description with the time, status and authority to fulfil it. The DSL will:

- make or oversee referrals to children's social care (MAST, or the child's home authority), the police, Prevent and other agencies
- support staff to identify concerns early and take appropriate action, including Family Help
- keep secure, accurate child protection records and transfer them appropriately
- hold DSL training refreshed at least every two years, and update knowledge at least annually
- take the lead on online safety and on the safeguarding side of filtering and monitoring
- oversee Operation Encompass notifications and responses
- consider involving parents and carers when deciding whether support can be managed within school, unless this would put the child at greater risk
- when a student moves school, transfer the child protection file securely within five school days of an in-year move, or within the first five days of a new term, obtain confirmation of receipt, and share information showing that a student may pose a risk to themselves or others. A direct DSL-to-DSL conversation takes place where concerns are significant
- liaise with the Headteacher and LADO on allegations, and with the proprietor and governing body on reviewing this policy

DSL cover. Cover is clear, reliable and known to all staff. A trained DSL or deputy is available on every site throughout the school day and during any school-run activity. If no DSL or deputy can be reached, staff speak to the most senior available member of staff and, if needed, contact children's social care directly. Unavailability must never delay a referral.

6.3 Proprietor and governing body

The proprietor and governing body make sure that:

- a senior leader is appointed DSL, with the role set out in their job description, and has enough time, training, resources and authority
- all staff and governors receive induction and regular safeguarding training

- this policy is reviewed at least annually, approved by the governing body and published on the website
- appropriate filtering and monitoring is in place, with a named senior leader responsible and checks at least every academic year (section 13)
- safer recruitment is followed and the Single Central Record is accurate (section 17)
- allegations, low-level concerns and whistleblowing procedures are in place and a safe culture is maintained
- the governing body receives a termly safeguarding report (concerns, referrals, training compliance, audit findings, classroom removals and part-time timetables) and an annual safeguarding report
- the nominated Safeguarding Governor, **Rhys Robotham**, is trained, makes monitoring visits, reviews records and systems, samples the Single Central Record with leaders, and reports to the governing body at least annually

6.4 Headteacher

The Headteacher implements this policy, makes sure DSL cover is in place at all times, acts as case manager for allegations against staff, makes sure safer recruitment is followed, and tells parents about our safeguarding arrangements.

7. Recognising abuse and taking action

Staff keep an attitude of "it could happen here". Indicators often overlap, and there may be no obvious sign. Staff act on concerns without waiting for certainty.

The main categories of abuse are physical abuse, emotional abuse (including persistent verbal abuse and criticism), sexual abuse (including causing a child to take part in sexual activity) and neglect. Staff are also alert to exploitation (CSE and CCE), serious violence, radicalisation, domestic abuse (including child-to-parent abuse), honour-based abuse, FGM, forced marriage, modern slavery and trafficking, and harm to mental health. Definitions are in Appendix A.

7.1 If a child is in immediate danger

Immediate danger — action required now
Call 999 immediately. Then contact Kent County Council: 03000 41 91 91. 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 tells you something, or you are worried

- Listen calmly. Use the student's own communication method (AAC, symbols, visuals). Do not interview, ask leading questions or promise secrecy.
- Tell the student they have done the right thing, will be taken seriously, and what will happen next, in a way they can understand.
- Record what the student said or showed, in their own words, signs or symbols, as soon as possible and on the same day.
- Report to the DSL straight away and in any case the same day.
- If you cannot reach the DSL or a deputy and believe a child is at risk of significant harm, contact children's social care directly.

7.3 Family Help and escalation

Staff consider whether a student or family may benefit from Family Help before statutory intervention is needed. KCSIE 2026 highlights, among others, students who are pregnant or parents, students showing early signs of harmful behaviour towards others, and students who are repeatedly removed from class or on part-time timetables. The DSL works with the home authority's Family Help services and escalates without delay if concerns persist or worsen, using the THSCP escalation procedure where there is professional disagreement. Family Help or monitoring never replaces a required child protection referral.

7.4 Mandatory reporting of child sexual abuse

The Crime and Policing Act 2026 introduces a legal duty for people in regulated activity with children to report child sexual abuse, and makes it an offence to prevent or deter someone from reporting. The duty is not yet in force; the government expects commencement no earlier than 12 months after Royal Assent (29 April 2026). Our current expectation already exceeds it: every concern of sexual abuse is reported to the DSL immediately and referred without delay. This policy will be updated when the duty and its guidance commence.

8. Child-on-child abuse

Not acceptable, never normalised. Child-on-child abuse is never passed off as "banter", "having a laugh", "part of growing up" or "boys being boys". Even when there are no reports, it may still be happening.

Child-on-child abuse can include:

- bullying and cyberbullying, including prejudice-based and discriminatory bullying, racism and faith-targeted abuse
- physical abuse
- sexual violence and sexual harassment (section 9)
- making or sharing nudes and semi-nudes, including AI-generated or altered images (section 10)
- upskirting
- causing someone to engage in sexual activity without consent
- initiation and hazing-type violence
- abuse in intimate relationships between young people, including coercive control

Harmful sexual behaviour sits on a continuum from developmentally expected to abusive. Staff are trained to recognise where behaviour sits, to identify misogyny early, and to understand its links to violence against women and girls. Girls are more likely to be victims and boys perpetrators, but every report is taken seriously regardless of gender. Students with SEND, LGBTQ+ students and students from minoritised groups may face higher risk, and may also need support to understand the impact of their own behaviour.

8.1 Prevention

- A relational, whole-school ethos where respect is modelled and taught
- An adapted RSHE curriculum covering consent, boundaries, healthy relationships and how to report
- Staff training on recognising child-on-child abuse and harmful sexual behaviour, using NSPCC guidance
- Staff challenge inappropriate language and behaviour every time

8.2 How students can report

Students can tell any trusted adult. Routes are adapted for SEND, including visual supports, AAC, worry boxes and trusted key workers. The DSL makes sure at least one accessible route is always available to every student.

8.3 Responding and supporting

- Every report is taken seriously.
- The DSL leads, consulting children's social care and/or the police as needed.
- A risk assessment and safety plan protects the child harmed, the child who has harmed and others, and is reviewed regularly.
- The child harmed is supported and their wishes inform decisions.
- The child who has harmed is also treated as a child with safeguarding needs.
- Actions, decisions and reasons are recorded.
- Parents are normally informed unless this would increase risk or compromise an investigation.

9. Sexual violence and sexual harassment between children

Sexual violence includes rape, assault by penetration (including with an object) and sexual assault. Sexual harassment is unwanted conduct of a sexual nature, including comments, gestures, online harassment, sharing sexual images, and coercion or threats. We are clear that neither is tolerated. We respond case by case, reassure the child harmed that they are taken seriously, put safety measures in place, and work closely with police and social care, following KCSIE 2026 Part Five.

10. Making and sharing nudes and semi-nudes

All incidents of making or sharing nudes and semi-nudes are safeguarding concerns, including digitally altered and AI-generated images and deepfakes. Staff must not view, copy, print or forward imagery. They secure the device if safe to do so and tell the DSL immediately. The DSL follows the UKCIS guidance *Sharing nudes and semi-nudes*, considers referral to police and/or social care, uses tools such as Report Remove to have content taken down, and records all decisions and reasons. Parents are normally informed unless this would put the child at further risk.

11. Specific safeguarding issues

11.1 Child sexual and criminal exploitation (CSE and CCE)

Exploitation uses an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity, including county lines and cuckooing. It may involve organised networks, may appear consensual and may happen online. The Crime and Policing Act 2026 creates specific offences of child criminal exploitation and cuckooing. Children who are exploited are victims, not offenders. Indicators include unexplained money or gifts, going missing, changes in behaviour or friendships, and association with older people. The DSL uses the THSCP exploitation tools and refers to children's social care and the police. Where a child may be a victim of modern slavery, the DSL makes a National Referral Mechanism referral.

11.2 Domestic abuse

Domestic abuse includes controlling, coercive, threatening, violent or abusive behaviour between people aged 16 or over who are personally connected, and abuse by a child towards a parent or carer. Children who see, hear or experience its effects are victims in their own right. We take part in Operation Encompass and act on police notifications the next school day, and contribute to MARAC where asked.

11.3 Honour-based abuse, FGM and forced marriage

All honour-based abuse is abuse. A teacher who, in the course of their work, discovers that FGM appears to have been carried out on a girl under 18 must personally report it to the police (FGM Act 2003, as amended), and also tell the DSL. Parents must not be told before advice has been sought where FGM is suspected. Forced marriage concerns are referred to the DSL and the Forced Marriage Unit.

11.4 Radicalisation and the Prevent duty

All staff complete Prevent awareness training and the DSL has completed Channel awareness training. Concerns about radicalisation, including through online content, misinformation and conspiracy theories, go to the DSL, who considers a Prevent referral through the Kent County Council pathway and the national referral form. Where there is a risk to life, call 999. See the Prevent Policy.

11.5 Serious violence

Staff know the indicators that a student may be at risk of, or involved in, serious violence, including carrying, threatening to use or using a weapon, gang association, disrupted education, unexplained injuries or possessions, and changes in friendships. We respond with Family Help, safety planning and referral to social care and/or the police.

11.6 Mental health, self-harm and suicide risk

We take a whole-school approach to mental health and emotional wellbeing. Mental health problems can sometimes indicate that a child has suffered or is at risk of abuse, neglect or exploitation. **Self-harm, suicidal thoughts and suicide risk, and eating disorders are safeguarding concerns in their own right** and are reported to the DSL immediately. Warning signs include changes in behaviour, sleep or eating, withdrawal, and talk of hopelessness. In an emergency, staff call 999. Staff do not diagnose. Any mental health support or intervention we offer must be evidenced as safe, effective and appropriate. Staff are trained not to treat distress as simply a feature of SEND.

11.7 Attendance, children missing education, classroom removal and part-time timetables

Absence is a potential safeguarding concern, particularly repeat or prolonged absence. We follow *Working together to improve school attendance* (statutory) and the Pupil Registration Regulations 2024, including telling the local authority about non-standard admissions and removals from roll. Attendance is triangulated with welfare and safeguarding information and escalated promptly.

Every **removal of a student from the classroom** is recorded with the reason, and patterns are tracked centrally by leaders. Any **part-time timetable** is time-limited, agreed with parent/carers and the local authority, reviewed regularly, and has a plan for return to full time. Both are reported to governors termly.

11.8 Private fostering

Private fostering is when a child under 16 (under 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. We notify the local authority **where the child lives**.

11.9 Children with family members in prison

We work sensitively with families, maintain confidentiality and give appropriate support.

11.10 Cybercrime

Staff are alert to students being victims of, or involved in, cybercrime. The DSL refers concerns to the police (including Cyber Choices) where a crime may have been committed.

11.11 Medical conditions and neglect

A medical condition alone does not warrant a referral, but it may indicate neglect if, for example, a student repeatedly arrives without essential medication or appointments are repeatedly missed.

12. Students who may need additional support

12.1 Looked-after and previously looked-after children

The Designated Teacher works with social workers, the Virtual School Head and Independent Reviewing Officers; makes sure Personal Education Plans are completed and acted on; uses Pupil Premium Plus well; stays alert to the continuing vulnerability of previously looked-after children; and tells the social worker immediately about any suspension, unexplained absence or change in circumstances.

12.2 Children with a social worker

We share welfare and safeguarding information with the allocated social worker, contribute to child in need and child protection plans, and escalate immediately when a child with a social worker is absent without explanation.

12.3 Young carers

We identify young carers, give support in school and signpost to local young carers' services.

12.4 LGBTQ+ students

LGBTQ+ students, and those perceived to be, can face higher risk of harm, including homophobic, biphobic and transphobic bullying. Staff are trained to recognise and respond, and we promote an environment in which every student is respected.

12.5 Gender questioning children

We follow the statutory guidance in KCSIE 2026 on gender questioning children:

- The school does not initiate any action. A request to socially transition must come from the student or their parents.
- Parents are involved as a priority, and their views carry great weight. Only in rare cases where involving parents would put the child at risk of significant harm is the DSL consulted, and a safeguarding decision made and recorded.
- Each request is considered individually, with the student's wellbeing, any SEND or mental health needs and wider safeguarding in mind.
- Toilets, changing rooms and sport are arranged in line with the guidance and the Equality Act 2010. Single-sex facilities are provided by biological sex, with self-contained alternatives where possible.
- Decisions and reasons are recorded clearly and reviewed.
- Every student is protected from bullying and harassment, whatever their identity.

13. Online safety, filtering and monitoring

Online safety is part of safeguarding and covers the four Cs: content, contact, conduct and commerce, including risks from generative AI. The DSL takes lead responsibility for online safety.

13.1 Named roles

Role	Name
Senior leader responsible for filtering and monitoring (strategic, annual review)	Jalmat Miah, Proprietor and Acting Headteacher
Safeguarding oversight and response to alerts	Jalmat Miah, DSL, supported by Yamna Saeed, Deputy DSL
Deputy oversight when the DSL is unavailable	Yamna Saeed, Deputy DSL
Technical administration and reporting	Waqas Riaz, Operations Director

13.2 Standards and checks

We use Lightspeed filtering and monitoring on all school devices and networks. The proprietor and governing body make sure filtering and monitoring meet the DfE standards. Effectiveness is reviewed, and checks are carried out **at least once every academic year**, across all relevant locations, users and internet-connected devices, and after any significant change. Checks and decisions about what is blocked or allowed are recorded (Appendices G–I).

13.3 Generative AI

Only approved AI tools are used, after risk and data protection assessment and in line with the DfE product safety expectations. Any AI-generated child sexual abuse material or deepfake imagery is reported to the DSL immediately, who refers to the police and social care.

13.4 Mobile phones and smart technology

In line with the DfE statutory guidance (from 1 September 2026), OMG School Kent is phone-free by default throughout the school day, including lessons, breaks and lunchtime, with reasonable adjustments where a student's needs require them. See the Mobile and Smart Technology Policy.

13.5 Training and curriculum

Staff receive online safety training, including filtering and monitoring roles, at induction and annually. Students receive adapted online safety education covering risks, generative AI, misinformation, reporting and respectful online behaviour.

14. Information sharing and confidentiality

Data protection law does not prevent sharing information to keep children safe. Lawful bases may include legal obligation, public task and vital interests, and, where commenced under the Data (Use and Access) Act 2025, the recognised legitimate interest of safeguarding. We share with those who need to know, in line with KCSIE 2026, Working Together 2026 and THSCP information-sharing guidance. Staff never promise secrecy. Decisions to share or not share are recorded with reasons. Subject access requests involving safeguarding information are referred to the DSL and Data Protection Officer.

15. Record keeping

- Records are clear, factual, timely and include the child's own words or communication, the date, actions and reasons.

- Child protection files are held securely and separately from the main student file, on the school's secure electronic platform.
- Files are transferred within five school days of an in-year move, or within the first five days of a new term, with confirmation of receipt (section 6.2).
- Parents are made aware that records exist unless this would put a child at risk.
- Records are retained in line with the school's approved retention schedule and current guidance on keeping safeguarding records.

16. Working with parents and carers

We normally discuss concerns with parents and carers unless this would put a child at greater risk, impede an investigation or be otherwise inappropriate. The DSL seeks advice from children's social care where unsure. For child-on-child incidents, information is shared with both families in line with police and social care advice. Decisions and reasons are recorded.

17. Safer recruitment

We follow KCSIE 2026 Part Three and keep a Single Central Record of all checks. Requirements include:

- a safeguarding statement in every advert
- scrutiny of applications and employment gaps; references, including a safeguarding-specific reference, obtained before appointment
- identity, right to work and qualifications
- an enhanced DBS check with children's barred list check for anyone in regulated activity. Following the Crime and Policing Act 2026, **supervision no longer removes a role from regulated activity**: regular work with children on three or more days in any 30-day period, or overnight, is regulated activity whether supervised or not, and existing volunteers in such roles are checked
- staff do not start work until the barred list check and enhanced DBS check have been received. In the limited circumstances KCSIE allows (barred list check received, all other checks complete, certificate pending), the person is supervised and a risk assessment recorded
- section 128 checks for anyone taking up a management position
- prohibition-from-teaching checks for teaching roles
- online searches for shortlisted candidates
- overseas checks where applicable
- at least one safer-recruitment-trained member on every interview panel

Volunteers who are not in regulated activity are risk assessed and supervised, with an enhanced DBS check (without barred list) where eligible. Contractors and agency staff are checked to the same standard, with written confirmation from agencies. See the Safer Recruitment Policy.

18. Allegations against staff, supply staff, volunteers and contractors

18.1 Allegations that may meet the harm threshold

The harm threshold is met where a person 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 pose a risk of harm to children; or behaved in a way that indicates they may not be suitable to work with children.

- Report immediately to the **Headteacher** (Jalmat Miah, Proprietor and Acting Headteacher), the case manager.

- The Proprietor currently also acts as Headteacher. If the allegation concerns the **Proprietor/Acting Headteacher (Jalmat Miah)**, report **directly to the Kent County Council LADO** and inform the **Chair of Governors, Gary Macey**, who acts as case manager. Do not report it to the person concerned.
- The case manager considers a LADO referral at an early stage and refers within one working day of becoming aware of an allegation that meets the harm threshold.
- The person concerned is not interviewed or told of the allegation until the LADO advises.
- Immediate protective action and police or social care referrals do not wait for LADO advice.
- Allegations against supply staff, contractors and trainee teachers follow the same process. The school gathers the facts and manages safeguarding, and the agency normally leads on any disciplinary action.
- A DBS referral is made when the legal criteria are met. Referral to the Teaching Regulation Agency is considered, with due regard to the Public Sector Equality Duty.

18.2 Low-level concerns

A low-level concern is any concern, however small, that an adult's behaviour towards a child may be inconsistent with the staff code of conduct, including outside work, but does not meet the harm threshold. Examples include being overfamiliar, having favourites, being alone with a child unnecessarily, using inappropriate language, or communicating outside approved channels.

- Staff are encouraged to share low-level concerns, including self-reports, with the Headteacher/DSL or Deputy DSL as soon as possible. Low-level concerns about the Proprietor/Acting Headteacher go to the Chair of Governors.
- Concerns are recorded, even when resolved, and reviewed for patterns.
- The LADO is consulted if a concern or pattern may meet the harm threshold, or if the threshold is unclear.
- A low-level label is never used to avoid a referral.

Staff who raise concerns in good faith are supported and will not be treated adversely. See the Whistleblowing Policy.

18.3 Use of school premises by other organisations

Where an allegation relates to a third party using our premises, we follow our safeguarding procedures and inform the LADO, and our lettings agreements require the hirer to have equivalent safeguarding arrangements.

18.4 Fair process for staff

Staff subject to an allegation have the right to a fair, timely and consistent process and to support. Suspension is not automatic. We conclude processes even if the person leaves.

19. Restrictive intervention and reasonable force

We minimise the need for restrictive intervention through relational practice, Positive Behaviour Support, early intervention and de-escalation. Staff are trained in positive handling. Any restrictive intervention is lawful, necessary, proportionate, the least restrictive option and as brief as possible. We record it fully, including the student's account and any injury; report it to parents unless this would increase risk; and review it with leaders and governors to identify patterns and learning. Particular care is taken with students with sensory or communication differences. See the Positive Handling – Restrictive Interventions Policy.

20. Preventative education

We teach students, in ways adapted to their SEND and communication needs, about consent and boundaries, healthy and unhealthy relationships, recognising abuse, online safety, misinformation and AI, how to report concerns and where to get help. RSHE is delivered sensitively and inclusively, and content is shared with parents so that skills can be reinforced at home.

21. Training and induction

- All staff receive safeguarding and child protection training at induction, including online safety and filtering and monitoring roles, with updates at least annually.
- The DSL and deputies refresh their training at least every two years and update knowledge at least annually.
- Governors receive safeguarding training at induction, with regular refreshers.
- Supply and agency staff receive a local safeguarding induction on their first day, before working with students, covering this policy, the staff code of conduct, key contacts and how to report.
- Records are kept of training and of staff confirmations that they have read this policy and KCSIE Part One.

22. Multi-agency working

We work in accordance with the Kent County Council Safeguarding Children Partnership, local thresholds and referral pathways. The school is part of the wider safeguarding system for children and will work with children's social care, police, health and other agencies to identify need, share information and protect children.

The school will contribute to universal support, community-based early help, Family Help, section 17 child in need plans, section 47 enquiries, child protection conferences, core groups, strategy discussions and contextual safeguarding responses as required.

23. Whistleblowing and complaints

Staff and volunteers can raise concerns about poor or unsafe practice without fear of reprisal, internally to the DSL, Deputy DSL, or the Chair of Governors, or externally to the LADO, Ofsted, or the NSPCC Whistleblowing Advice Line (0800 028 0285). Parents can use the complaints procedure; any complaint alleging harm goes straight into the safeguarding process.

24. Monitoring and review

This policy is reviewed at least annually and whenever statutory guidance, legislation, local procedures or school arrangements change. It is approved by the governing body and proprietor and published on the website. Contact details are updated without delay. After any serious incident, allegation, pattern of concern or external review, leaders carry out a reflective review and act on the learning.

25. Linked policies

Allegations Against Staff (including Low-Level Concerns) · Anti-Bullying · Attendance · Behaviour and Relationships · Child-on-Child Abuse · Children Missing Education · Complaints · Data Protection · Equalities · Filtering and Monitoring · First Aid · Health and Safety · Intimate Care · Online Safety · ICT Acceptable Use · Mobile and Smart Technology · Positive Handling – Restrictive Interventions · Prevent · Relationships, Sex

and Health Education · Safer Recruitment · SEND · Staff Code of Conduct · Supporting Students with Medical Conditions · Whistleblowing

Appendix A. Categories and indicators of abuse

Staff should be familiar with the definitions in KCSIE 2026. Indicators often overlap and may not be obvious.

Physical abuse: hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, including fabricating or inducing illness.

Emotional abuse: persistent emotional maltreatment causing severe and adverse effects on emotional development, including making a child feel worthless or unloved, persistent verbal abuse and criticism, age-inappropriate expectations, serious bullying, or seeing or hearing the ill-treatment of others.

Sexual abuse: forcing, enticing or causing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes contact and non-contact abuse, including online grooming and the production of sexual images. All sexual activity with a child under 13 is an offence.

Neglect: persistent failure to meet a child's basic physical and/or psychological needs, likely to seriously impair health or development, including food, clothing, shelter, supervision, medical care and emotional responsiveness.

Exploitation (CSE and CCE): use of an imbalance of power to coerce, control, manipulate or deceive a child into sexual or criminal activity. It may appear consensual and may happen online.

Domestic abuse: see section 11.2, including child-to-parent abuse.

Honour-based abuse, FGM and forced marriage: see section 11.3.

Radicalisation: the process by which a person comes to support terrorism or extremist ideologies. Indicators include changes in belief, language, associations and online activity.

Modern slavery and trafficking: recruiting, moving or holding people by threat, force or deception for exploitation.

Prejudice-based harm: harm motivated by race, faith, disability, sex, sexual orientation, gender identity or other characteristics.

Appendix B. Safer recruitment checks — summary

Check	Requirement
Enhanced DBS with children's barred list	Everyone in regulated activity. Supervision no longer removes a role from regulated activity (Crime and Policing Act 2026)
Identity and right to work	All staff, before appointment
References	At least two, including safeguarding questions, before appointment
Qualifications	Where relevant to the role
Section 128 check	Anyone in a management position

Check	Requirement
Prohibition from teaching	All teaching roles
Online search	Shortlisted candidates, recorded
Overseas checks	Where the candidate has lived or worked abroad
Safer recruitment training	At least one panel member per interview

Appendix C. Allegations against staff — process

Stage	Action
Allegation received	Report immediately to the Headteacher (Jalmat Miah, Proprietor and Acting Headteacher). If about him, directly to the LADO and inform the Chair of Governors (Gary Macey), who acts as case manager.
Immediate safety	Protect the child; call 999 or refer to social care if needed. Do not wait for LADO advice.
Within one working day	Headteacher consults LADO: **03000 41 11 11**
LADO advice	Follow advice on investigation, suspension and communication. Do not interview the person concerned until advised.
Outcomes	Substantiated · unsubstantiated · unfounded · false · malicious
Referrals	DBS referral when the legal criteria are met. Consider a TRA referral.
Records	Kept in line with KCSIE 2026 and the approved retention schedule; malicious allegations removed from personnel files
Low-level concerns	Recorded, reviewed for patterns, LADO consulted if the threshold may be met

Appendix D. Quick-reference flowcharts

D1 — Concern about a student (no immediate danger). 1. Report to the DSL immediately. 2. If the DSL is unavailable, speak to a deputy DSL or the most senior available staff member. 3. If no senior staff member is reachable, contact Kent County Council for advice: **03000 41 11 11**. 4. The DSL decides on

early help, monitoring, referral and/or police involvement. 5. Record rationale, actions and outcomes. 6. Review and escalate if there is no improvement or risk increases.

D2 — Student at immediate risk. 1. Call 999 immediately 2. Contact Kent County Council 03000 41 91 91. 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 an adult. 1. Report immediately to the Headteacher. If the allegation concerns the Headteacher, report immediately to the Proprietor, Jalmat Miah.
2. The Headteacher (as case manager) considers whether the harm threshold is met
3. If the harm threshold is met: consult LADO within 1 working day — 03000 41 11 11
4. Do not investigate or interview the subject until advised by LADO
5. Manage under KCSIE 2026 Part 4
6. Record securely; consider DBS or TRA referrals at conclusion

Appendix E. Staff quick-reference card

Reading: KCSIE 2026 Part One in full, and this policy. Sign to confirm, and refresh every year.
Immediate danger: 999, then children's social care. Tell the DSL. Anyone can refer.
Any other concern: DSL the same day (Jalmat Miah 0749 833 0265, or Yamna Saeed 07741 295 284). Record the student's own words or signs.
SEND: never assume a behaviour, injury or distress is "because of" a student's needs. Use AAC, visuals and the student's preferred communication.
Self-harm or suicidal thoughts: tell the DSL immediately; 999 in an emergency.
Child-on-child abuse: not acceptable. Challenge it, report it and record it.
Online: report harmful content or alerts to the DSL straight away.
Worried about an adult? Tell the Headteacher (Jalmat Miah). If it is about him, tell the LADO (**03000 41 11 11**) and the Chair of Governors (Gary Macey).

Appendix F. Compliance matrix

Requirement (KCSIE 2026 / ISS / WT 2026)	Section
All staff read Part One in full; training at induction and annually	6.1, 21
Whole-school, child-centred approach	2, 4, 5, 20
DSL in senior leadership; deputies; cover arrangements	1, 6.2, 6.4
Proprietor and governor oversight; safeguarding governor	6.3
Family Help and local thresholds	3, 7.3, 22
SEND barriers; no diagnostic overshadowing	4, 7.2, 8.2
Prejudice-based harm and anti-racism	5, 5.1, 8

Requirement (KCSIE 2026 / ISS / WT 2026)	Section
Child-on-child abuse, harmful sexual behaviour, misogyny	8, 9
Nudes and semi-nudes, including AI imagery	10, 13.3
Mental health, self-harm and suicide risk	11.6
Attendance, CME, classroom removal, part-time timetables	11.7
Gender questioning children	12.5
Online safety; filtering and monitoring checks each academic year	13
Phone-free by default	13.4
Information sharing and records; file transfer within five days	14, 15
Safer recruitment; supervision exemption removed	17, App B
Allegations, low-level concerns, independent route	18, App C
Mandatory reporting duty (forthcoming)	7.4
Relevant partner in local safeguarding arrangements	2, 22
ISS Part 3 — welfare, health and safety	2, 4, 6, 19
Annual review, governor approval, publication	24

Appendix G. Filtering and monitoring statement

- **Purpose:** to set out how OMG School Kent protects students and staff online on school devices and networks.
- **Scope:** all users of school devices, platforms and networks, on site and remotely.
- **Systems:** Lightspeed filtering and monitoring, with alert management and technical reporting.
- **Coverage:** staff, students, supply staff and visitors on school networks; guest access is controlled and logged.
- **Governance:** the Proprietor (senior leader responsible) reviews effectiveness at least every academic year with the Safeguarding Governor; the DSL and Deputy DSL provide safeguarding oversight; the Operations Director provides technical reports.
- **Decisions:** what is blocked or allowed is documented with reasons; changes are logged and reviewed.
- **Risk profile:** decisions reflect a specialist SEND/SEMH cohort with higher online risk.

- **Limitations:** no system is 100% effective; education, supervision and clear reporting remain essential.

Appendix H. Annual filtering and monitoring review log

Complete at least once every academic year and after any significant change. Keep the governing body minutes.

Review date	Attendees	Key decisions and reasons	Actions and owners	Status

Appendix I. Filtering and monitoring test checks log

Date	By	Location /device/ user	Scenario tested	Expected	Observed	Action

Appendix J. Remote and online learning acceptable use

- Use only school-approved platforms and accounts.
- Keep sessions to scheduled times. Do not start unscheduled one-to-one video calls with students unless agreed with the DSL or SLT and recorded.
- Use neutral backgrounds and dress professionally.
- Students and parents must not record sessions without the school's written permission.
- Safeguarding first: if you see or hear something worrying, end the session safely, contact the DSL immediately and record the facts.
- Keep language, behaviour and content professional.
- Share the minimum personal data needed. Store material on school systems, never personal devices.
- Students and parents follow the Student Acceptable Use Agreement.
- Make reasonable adjustments and provide accessible formats for students with SEND.