



Safeguarding and Child Protection Policy

Harmony Alternative Education Ltd

Effective from September 2026

Status	Statutory
Owner	Harmony Alternative Education Ltd
Approved by	Proprietors and senior leaders
Review cycle	At least annually and after any significant change or incident
Date approved	September 2026
Next review	September 2027 or earlier if guidance changes
IMMEDIATE ACTION: If a child is in immediate danger, call 999. Any safeguarding concern must be reported to the DSL or a deputy immediately and recorded on CPOMS without delay. If a DSL is unavailable, staff must act themselves.	

This policy replaces the September 2025 policy. It reflects Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and legislation and statutory guidance in force in England at the date of approval.

Document control and key contacts

Role	Name	Contact route
Designated Safeguarding Lead Primary	Sarah Baker	In person, telephone (07508 448689) or CPOMS
Designated Safeguarding Lead Secondary	Victoria Balls	In person, telephone (07432 211616) or CPOMS
Deputy Designated Safeguarding Lead Primary	Sarah Smith	In person, telephone (07743 932623) or CPOMS
Deputy Designated Safeguarding Lead Secondary and SENDCo	Sian McDonald	In person, telephone (07842 305668) or CPOMS
Designated teacher for looked-after and previously looked-after children	Sarah Baker Primary / Victoria Balls Secondary	Via the DSL team

Key personnel

Designated Safeguarding Lead (Primary/Ash)  Sarah Baker	Deputy Safeguarding Lead (Primary/Ash)  Sarah Smith
Designated Safeguarding Lead (Secondary)  Victoria Balls	SENDCo/DDSL (Secondary)  Sian McDonald

External safeguarding contacts

Service	Contact	When to use
Emergency services	999	Immediate danger or a crime in progress
RBWM Single Point of Access	01628 683150 and Single Point of Access referral form	Concerns about a child living in Windsor and Maidenhead; use the child's home authority for children living elsewhere

Service	Contact	When to use
RBWM Emergency Duty Team	01344 351999	Urgent safeguarding concern outside office hours
Achieving for Children LADO	07774 332675 and online LADO referral form	Allegation or concern about an adult working or volunteering with children
BUCKS Children's Social Care First Response Team	01296 387146 and Online MARF	Concerns about a child living in Buckinghamshire; use the child's home authority for children living elsewhere
Wokingham Children's Services Triage Team	0118 908 8002 and mailto:triage@wokingham.gov.uk Wokingham Children's Services MARF	Concerns about a child living in Bracknell Forest; use the child's home authority for children living elsewhere
BFC Multi-Agency Safeguarding Hub MASH	01344 352005 and BFC online referral form	Concerns about a child living in Wokingham; use the child's home authority for children living elsewhere
NSPCC whistleblowing advice line	0800 028 0285 / help@nspcc.org.uk	When staff cannot raise safeguarding failures internally
Police non-emergency	101	Crime-related advice where there is no immediate danger

Contact details must be checked at every review. Harmony works with children placed by different schools and local authorities; referrals must be made to the children's social care service for the authority where the child lives, while also informing the commissioning school or authority unless doing so creates risk or delays urgent action.

Achieving for Children safeguarding referrals: <https://www.achievingforchildren.org.uk/pages/reporting-concerns>

Achieving for Children LADO: <https://www.achievingforchildren.org.uk/pages/reporting-concerns/local-authority-designated-officer-lado>

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1 Purpose and scope

This policy explains how Harmony Alternative Education Ltd safeguards and promotes the welfare of every child who attends, visits or is affected by our work. It applies on site, during off-site and sports activities, while travelling under Harmony's supervision, in online learning and communications, and whenever staff become aware of a concern connected with a child.

It applies to proprietors, senior leaders, employees, self-employed staff, agency and supply staff, trainee teachers, volunteers, contractors, visitors and any adult working for or on behalf of Harmony. "Child" means anyone under 18. "Staff" in this policy includes every category listed above unless the context states otherwise.

"Safeguarding and promoting the welfare of children is everyone's responsibility." — KCSIE 2026, paragraph 2

Harmony is an alternative provision provider. The commissioning school or local authority retains its own safeguarding responsibilities. Harmony will maintain clear, timely two-way communication with the commissioner, but this does not replace any staff member's duty to act immediately where a child may need help or protection.

Our principles

- The child's welfare and best interests are paramount.
- Safeguarding is child-centred, coordinated, trauma-informed and grounded in professional curiosity.
- All children have an equal right to protection. Practice will be inclusive, anti-racist and anti-discriminatory.
- Children's wishes, feelings, communication needs and lived experience will be heard and taken seriously.
- Abuse, neglect and exploitation may occur inside or outside the home or provision, face to face or online, and different forms of harm commonly overlap.
- No concern is too small to share. Staff must never assume that another professional will act.
- Safeguarding responses will be proportionate, recorded and reviewed, with reasons for decisions clearly documented.

Definitions

Safeguarding includes providing help and support as soon as problems emerge; protecting children from maltreatment within or outside the home, including online; preventing impairment of mental and physical health or development; ensuring safe and effective care; and taking action so children have the best outcomes.

Child protection is the activity undertaken to protect a specific child who is suffering, or is likely to suffer, significant harm. Abuse may be physical, emotional or sexual, or arise through neglect. Exploitation, modern slavery and extra-familial harm may cut across these categories.

A victim may not identify with that term. Staff will use language the child is comfortable with. References to an alleged perpetrator are not findings of fact and must be used carefully, especially where the person is also a child.

2 Legal and guidance framework

Harmony will have regard to the following legislation and guidance, together with local multi-agency procedures and the terms of each placement agreement. Where a source changes, the current official version applies.

Core statutory guidance

Keeping Children Safe in Education 2026: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working Together to Safeguard Children 2026: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

What to do if you are worried a child is being abused: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Information sharing advice for safeguarding practitioners: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Prevent duty guidance: <https://www.gov.uk/government/publications/prevent-duty-guidance>

Use of reasonable force and other restrictive interventions: <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Working together to improve school attendance: <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

Statutory guidance for alternative provision: <https://www.gov.uk/government/publications/alternative-provision>

Principal legislation

- Children Acts 1989 and 2004, including sections 17, 20, 31 and 47 of the 1989 Act and sections 10 and 11 of the 2004 Act
- Education Act 2002, including section 175 where applicable, and Education and Inspections Act 2006, including sections 93 and 93A
- Education Act 1996 and statutory attendance and children missing education duties
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026, including changes to regulated activity
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Equality Act 2010, including reasonable adjustments and the Public Sector Equality Duty where applicable
- Human Rights Act 1998
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Counter-Terrorism and Security Act 2015
- Domestic Abuse Act 2021
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015
- Modern Slavery Act 2015
- Voyeurism (Offences) Act 2019
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012
- Children and Families Act 2014 and SEND Code of Practice

This policy is not a substitute for the full statutory guidance. All staff must follow KCSIE 2026 Part One and Harmony's procedures. DSLs, deputies and senior leaders must understand the whole guidance relevant to their role.

3 Governance and leadership responsibilities

Proprietors and senior leaders

- Take overall strategic responsibility for safeguarding arrangements and create a whole-provision safeguarding culture.
- Approve, publish and review this policy at least annually and whenever guidance, law, local procedures, provision or risk changes.
- Ensure policies cover child-on-child abuse, staff conduct, allegations and low-level concerns, attendance and absence, online safety, mobile phones, whistleblowing and behaviour.
- Appoint an appropriately senior DSL with explicit status, authority, time, funding, training, resources and cover.
- Ensure robust cover when the DSL is unavailable, including a secure and confidential route for urgent contact and handover.
- Ensure safe recruitment, a compliant single central record where required, ongoing suitability and statutory referrals.
- Ensure safeguarding is considered in curriculum, premises, sports, external activities, contractors and use of premises by third parties.
- Ensure appropriate filtering and monitoring, assign leadership and technical responsibilities, and receive assurance at least annually.
- Ensure complaints and allegations are handled without avoidable delay and that children and adults receive appropriate support.
- Monitor safeguarding themes, including attendance, child-on-child harm, prejudice, restrictive intervention and online concerns, without over-interpreting small cohorts.

Designated Safeguarding Lead

The Primary & Secondary DSL holds lead responsibility; this responsibility is not delegated. Deputies may carry out functions, but ultimate lead accountability remains with the DSL.

- Be available during teaching hours and establish reliable cover and handover arrangements for all Harmony activity.
- Manage referrals to children's social care, police, Channel, the Disclosure and Barring Service and other agencies as required, and support staff who make referrals.
- Liaise promptly with the commissioning school or authority while ensuring this never delays protection.
- Understand local assessment and threshold protocols, community-based early help and the targeted early help level of Family Help.
- Maintain detailed, accurate, secure and contemporaneous records, including decisions not to refer and the rationale.
- Lead on online safety and respond to filtering and monitoring reports.
- Promote attendance and educational outcomes for children with a social worker and other vulnerable children.

- Ensure transfer of child protection files securely, separately from the main pupil file, with confirmation of receipt.
- Encourage a culture of listening to children and trusted relationships adapted to communication needs.
- Support staff and maintain knowledge through formal training at least every two years, Prevent training and updates at least annually.

All staff and volunteers

- Read KCSIE 2026 Part One in full. The DfE overview is a quick reference only and does not replace Part One.
- Know this policy, the staff code of conduct, behaviour policy, online safety and mobile-phone rules, the response to absence from education, and the identity and role of the DSL team.
- Receive safeguarding and online-safety training at induction and updates at least annually, with additional briefings when risks change.
- Maintain professional curiosity, identify children who may benefit from support and act immediately on concerns.
- Record concerns on CPOMS and speak directly to a DSL where urgent. Recording must never delay a referral or emergency call.
- Never promise secrecy, investigate, ask leading questions, view sexual imagery unnecessarily or confront an alleged abuser.
- Escalate if they remain concerned. Any staff member may refer directly to children's social care or police.

4 Responding to concerns about a child

Immediate process

1. If there is immediate danger, serious injury or a crime in progress, call 999.
2. Listen, remain calm, take the child seriously and use open prompts only where necessary for clarification.
3. Explain that information must be shared with people who can help. Do not promise confidentiality.
4. Report immediately to the DSL or deputy. If neither is available, contact children's social care or police directly.
5. Record promptly on CPOMS using the child's own words where possible, separating fact, observation and professional opinion. Include date, time, location, witnesses, actions, decisions and rationale.
6. The DSL assesses risk, checks relevant history, considers the child's wishes and communication needs, and decides on support, Family Help or statutory referral.
7. Continue to monitor, support and escalate. If the situation does not improve, seek reconsideration using local escalation procedures.

"If staff have any concerns about a child's welfare, they should act on them immediately." — KCSIE 2026, paragraph 57

A lack of certainty is not a reason to delay. Where staff believe a referral is necessary and one has not been made, they must make it themselves and tell the DSL as soon as possible.

Responding to a disclosure

- Receive: give full attention and allow the child to speak at their pace.
- Reassure: explain they have done the right thing; they are not to blame and will be taken seriously.
- Respond: do not express shock, make promises, ask "why", investigate or ask the child to repeat the account unnecessarily.
- Report: tell the DSL immediately and call emergency services where required.
- Record: make a dated, timed, factual record as soon as possible, preserving the child's words and noting any questions asked.
- Remember: confidentiality is need-to-know, not secrecy. Do not discuss the concern with colleagues, parents or the alleged person unless authorised.
- Review: the DSL confirms action, support, information sharing and follow-up; the staff member must chase if no response is received.

Parents and carers

Harmony or the commissioning body will normally involve parents and carers, and children where appropriate. We will not do so before seeking advice if this may increase risk, lead to evidence being destroyed, impede a police or social-care enquiry, or create particular danger in forced marriage, FGM or honour or faith-based abuse. Reasons will be recorded.

Family Help and statutory intervention

Universal services and community-based early help may support a child before statutory intervention. Targeted early help and section 17 support may be delivered through Family Help. Staff must know local criteria and referral routes. A Family Help response does not replace child-protection action where section 47 concerns exist.

If support is agreed, Harmony will contribute to assessment and planning, maintain a consistent relationship with the child and family where appropriate, and review whether risk is reducing. Consent should normally be sought for voluntary help; consent is not required to share information necessary to protect a child from harm.

5 Information sharing and safeguarding records

Safeguarding information will be shared lawfully, fairly, securely and in time. Data protection law permits proportionate sharing to safeguard children and is not a reason to withhold information where sharing is necessary and justified.

“Fears about sharing information must not be allowed to stand in the way of safeguarding.” — Information sharing advice for safeguarding practitioners

- Share with those who need the information for a safeguarding purpose; do not share more than necessary.
- Where practicable, be open with the child and family unless this creates risk or undermines an investigation.
- Assess risk of sharing and not sharing, including urgency, accuracy, reliability, security and the child’s views.
- Record what was shared, with whom, when, why, lawful basis where relevant, and the outcome. Record reasons when information is not shared.
- Keep child-protection information separate, secure and access-controlled. CPOMS entries must be factual and must not be deleted or altered to conceal the original record.
- Transfer records promptly when a child moves, ideally within five days for an in-year transfer or within the first five days of a new term, obtaining confirmation of receipt.
- Retain and dispose of records under the retention schedule and any legal hold.

Data protection laws in this policy mean the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025. The DSL will consult the data protection lead or professional advice where needed, without delaying urgent safeguarding action.

6 Attendance and children absent from education

Absence, particularly repeated or prolonged absence, can be a warning sign of neglect, exploitation, abuse, mental ill-health, criminal activity, travelling to conflict zones, FGM or forced marriage. Children attending alternative provision or part-time timetables may face heightened risk.

- Record attendance accurately and follow up unexplained absence promptly on the day.
- Apply the child’s individual risk plan and notify the commissioning school or authority and social worker as agreed.
- Use more than one contact route where necessary and maintain professional curiosity about explanations.
- Notify children’s social care urgently where a child subject to a protection plan or otherwise high risk is unexpectedly absent.
- Escalate repeated or prolonged absence to the DSL, commissioner and relevant agencies; do not treat it only as an attendance matter.
- Follow children missing education and elective home education procedures and never remove a child from arrangements without the commissioner’s lawful decision.

7 Recognising abuse neglect and exploitation

Indicators are not proof. Children may show no obvious signs, may communicate non-verbally, may not recognise harm, or may delay telling because of fear, shame, disability, language, coercion or loyalty. Staff must avoid stereotypes and use professional curiosity.

Physical abuse

May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, including fabricated or induced illness. Injury explanations that are absent, inconsistent, or developmentally unlikely require attention.

Emotional abuse

Persistent emotional maltreatment may include criticism, belittling, name-calling, rejection, frightening, silencing, serious bullying, exploitation, corruption, inappropriate expectations or preventing normal interaction. It may occur alone and is present in other forms of abuse.

Sexual abuse

Includes forcing, causing or enticing a child to take part in sexual activity, whether or not the child understands and whether contact or non-contact. It includes sexual images, pornography, grooming, sexualised communication and abuse facilitated by technology. Most sexual abuse is by someone known to the child.

Neglect

Persistent failure to meet basic physical or psychological needs may impair health or development. It includes failures concerning food, clothing, shelter, supervision, medical care, emotional responsiveness and protection from danger. Neglect may begin during pregnancy.

Overlapping and extra-familial harm

Children may be harmed in peer groups, intimate relationships, communities, organised networks, public places or online. Risks include sexual harassment and exploitation, criminal and financial exploitation, modern slavery, trafficking, serious youth violence, county lines, stalking, radicalisation and coercive control. Context must inform assessment and safety planning.

8 Child-on-child abuse harassment and violence

Harmony has a zero-tolerance approach to child-on-child abuse. “Zero tolerance” means all concerns are recognised, recorded and responded to; it does not mean automatic exclusion. Harm is preventable and may be a safeguarding issue for both the child harmed and the child displaying harmful behaviour.

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse within intimate relationships between children, including coercive control and stalking
- physical abuse, initiation or hazing, serious violence and threats involving weapons
- sexual violence and sexual harassment, including misogynistic or misandrist conduct
- upskirting and other non-consensual image capture
- consensual or non-consensual making or sharing of nudes or semi-nudes, including content altered or wholly generated by AI
- online abuse, unwanted sexual content, pornography and abusive group-chat messages

Staff must not dismiss conduct as banter, part of growing up or “just having a laugh”. Reports will be considered case by case, including ages and development, power imbalance, SEND, coercion, repetition, location, online reach and wider peer context. Immediate safety and medical needs come first.

Response and risk assessment

- Reassure the child, avoid blame, preserve evidence and record separately for each child.
- Inform the DSL immediately. Consider police and children’s social care referrals and the need for a LADO referral if an adult response is implicated.
- Complete and regularly review a written risk and needs assessment for the child harmed, the child alleged to have caused harm and other children or staff.
- Separate children only as necessary and avoid measures that make the child harmed feel punished.
- Provide proportionate educational, pastoral, therapeutic and external support. Sanctions alone are rarely a complete safeguarding response.
- Respect the language the child prefers and avoid premature labels or assumptions of guilt.

Sexual imagery including AI-generated content

Every incident involving nudes or semi-nudes requires a safeguarding response, whether described as consensual or non-consensual. Staff must not view, copy, print, forward, save or ask a child to send imagery. The DSL follows UKCIS guidance and may view only in exceptional circumstances where necessary to decide protection or referral. AI-generated “deep nudes” and digitally altered content are included, even where no original nude image existed.

UKCIS guidance on sharing nudes and semi-nudes: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

9 Specific safeguarding risks

Child criminal exploitation child sexual exploitation and modern slavery

Exploitation may be committed by an individual, group, network or gang. A child may appear to consent, identify with a group, receive money or status, or be criminalised for conduct under coercion; none of these removes the need for protection. Criminal exploitation can include county lines, carrying weapons or drugs, robbery, financial fraud, money muling and forced criminality. Sexual exploitation involves an imbalance of power used to coerce, manipulate or deceive a child into sexual activity.

- unexplained money, gifts, travel, hotel use, phones or multiple SIMs
- going missing, being found out of area, unexplained injuries or deterioration in attendance
- relationships with older people or controlling peers
- fear, secrecy, debt, changed presentation or sexualised behaviour
- carrying weapons, drugs or large amounts of cash
- bank-account activity, cryptocurrency or online marketplace activity inconsistent with the child's circumstances

Potential modern slavery or trafficking must be referred to children's social care and police as appropriate. The DSL will consider the National Referral Mechanism; a child cannot consent to their own exploitation.

Serious violence and weapons

Warning signs may include increased absence, declining performance, change in friendships, unexplained gifts, injuries, involvement with offenders, threats, weapon-related language or online content. Staff will share intelligence promptly, assess safety and contact police immediately where a weapon or imminent danger is suspected. Searches are undertaken only by authorised staff and in accordance with current guidance.

Domestic abuse and teenage relationship abuse

Children are victims of domestic abuse where they see, hear or experience its effects. Abuse may be physical, sexual, emotional, economic, coercive or controlling and may continue after separation. This includes abuse in children's own intimate relationships. Harmony will respond to Operation Encompass notifications and provide discreet, trauma-informed support.

Misogyny/Misandry

Harmony AE Ltd is committed to fostering a culture of respect, inclusion and safety for all pupils. We will take a zero-tolerance approach to Misogyny, misandry, sexism and gender-based prejudice.

Staff will identify, challenge and respond to sexist, misogynistic or misandrist behaviour at the earliest opportunity.

We will not dismiss harmful behaviour as banter, part of growing up, or "boys being boys". Concerns will be addressed through education, support, behaviour management and safeguarding processes, as appropriate. We will promote positive and respectful relationships and ensure that all pupils feel safe, valued, heard and respected regardless of sex or gender.

Honour or faith-based abuse FGM and forced marriage

No culture, faith, tradition or family honour justifies abuse. Staff must report concerns immediately and must not speak to family or community members where this could increase risk. Teachers have a personal statutory duty to report to police known cases of FGM in an under-18; the DSL supports but cannot make the report instead of the teacher. Forced marriage is illegal, and arranging marriage for anyone under 18 is an offence whether or not force is used.

Radicalisation and extremism

Under the Prevent duty, Harmony assesses the risk of children being drawn into terrorism, provides training and teaches critical thinking and respectful debate. Concerns go to the DSL, who may seek local Prevent advice and refer to Channel. Information relevant to Channel should be shared with police in accordance with guidance. Emergency or crime concerns go directly to police.

Cybercrime

Children may be victims or become involved in unauthorised access, denial-of-service attacks, malware, phishing, fraud or other Computer Misuse Act offending. Interest in technology is not itself a concern. Staff report behaviour that causes harm or indicates grooming or criminal involvement; the DSL considers Cyber Choices and police referral.

Mental health self-harm and suicide

Mental-health difficulties can be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Only appropriately trained professionals diagnose conditions, but all staff act on concerns. Immediate risk of suicide, serious self-harm or medical emergency requires 999 or urgent health support. The DSL coordinates safeguarding referral, parental involvement where safe, and a support and safety plan. Self-harm must never be dismissed as attention-seeking.

Homelessness temporary accommodation and private fostering

Housing insecurity may increase risk and require Family Help or statutory support. The DSL will consider duties and notifications relating to temporary accommodation. A private fostering arrangement is where a child under 16, or under 18 if disabled, is cared for by someone who is not a parent or close relative for 28 days or more; the local authority must be notified.

Fabricated or induced illness

Concerns may arise where symptoms are fabricated, exaggerated or deliberately induced, or where presentation and clinical findings are perplexing. Staff record observations without accusing a parent or carer and refer to the DSL, who seeks health and social-care advice.

10 Children potentially at greater risk of harm

Vulnerability does not make abuse inevitable and must never reduce a child to a label. Harmony will consider intersecting needs, barriers to disclosure and the possibility that behaviour is communication.

Children with SEND

- recognise that signs may be attributed incorrectly to disability or behaviour
- avoid assuming injuries, isolation or distress are explained by SEND
- provide additional pastoral support and accessible communication
- recognise higher risks of bullying, grooming, sexual harm and online abuse
- make reasonable adjustments and ensure the child has a trusted adult and meaningful way to report

Children with medical conditions

Medical conditions, treatment dependence, intimate care, communication difficulty and absence may create additional vulnerability. Individual healthcare and risk plans will include safeguarding considerations, dignity, consent and escalation. Fabricated or induced illness concerns follow child-protection procedures.

Young carers

Young carers may experience hidden responsibility, isolation, absence and emotional pressure. Staff will identify support early, listen without stigma, consider Family Help and ensure caring responsibilities do not obscure abuse or neglect.

Children who are lesbian gay bisexual or gender questioning

Being LGB or gender questioning is not itself a safeguarding risk. Such children may face bullying, discrimination, family rejection or online targeting. Staff will provide a safe, respectful response, use professional curiosity, avoid outing a child without considering risk, and follow current law and guidance. Safeguarding decisions are individual and child-centred.

Children with a social worker and care-experienced children

Adversity and trauma may affect attendance, learning, behaviour, wellbeing and vulnerability to further harm. The DSL will use information about social-care involvement to inform decisions and promote educational outcomes. The designated teacher works with carers, social workers and Virtual School Heads, including their strategic role in attendance and children in kinship care where applicable.

Other circumstances

Additional attention may be needed for children affected by parental offending or imprisonment, substance misuse, adult mental ill-health, pregnancy or parenthood, racism or other discrimination, asylum or migration, poverty, unstable housing, repeat suspension or exclusion, part-time timetables, family breakdown or bereavement.

11 Online safety generative AI and mobile phones

Online safety is embedded in safeguarding, curriculum, staff training, behaviour and technology management. Risks are considered under content, contact, conduct and commerce and include misinformation, disinformation, conspiracy theories, grooming, coercion, scams, harmful content, sexual abuse, bullying and exploitation.

Generative AI

- Assess safety, privacy, age-appropriateness, bias, accuracy and safeguarding risk before any AI product is introduced.
- Do not enter personal, special-category or safeguarding information into unapproved AI systems.
- Teach children that AI can produce convincing false content and that prompts and outputs may be retained.
- Treat AI-generated sexualised images, deepfakes, grooming, harassment and impersonation as safeguarding concerns.
- Ensure staff review outputs and retain professional responsibility for decisions; AI must not make safeguarding decisions.

Filtering and monitoring

- The proprietors have strategic responsibility. A named senior leader, DSL and competent IT support have clear operational and technical roles.
- Filtering and monitoring are proportionate to age, SEND, risk profile, devices, locations, network access and the use of dynamic or AI-generated content.
- Effectiveness is reviewed at least once every academic year and after significant system, equipment, location or risk changes.
- Checks cover all school-managed internet-connected devices and all relevant locations. Findings, exceptions, decisions and actions are recorded.
- Staff understand how to report over-blocking, under-blocking, concerning searches and system alerts. The DSL reviews safeguarding reports and ensures action.
- Filtering does not replace supervision, education, professional curiosity or safe classroom practice.

DfE filtering and monitoring standard: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-core-standard>

Mobile phones and personal devices

Pupils in KS1-3 hand personal phones and connected devices to an adult on arrival and receive them at the end of the session, subject to agreed individual adjustments. KS4 must keep their phones in their bags and away from sight. Devices must not be shared. Staff use only authorised devices and systems to photograph, film or communicate with children. Personal devices must not be used to store pupil information or media. Any exception requires recorded approval and safeguards.

DfE mobile phones in schools guidance: <https://www.gov.uk/government/publications/mobile-phones-in-schools>

12 Curriculum relationships and pupil voice

Safeguarding education is planned, age-appropriate, inclusive and adapted for SEND and communication needs. It includes healthy relationships, consent, boundaries, online safety, image sharing, misinformation, bullying, prejudice, exploitation, domestic abuse, drugs, knife crime, radicalisation, personal safety and help-seeking. Teaching avoids victim-blaming and does not create disclosures in unsafe circumstances.

- Children know the DSL team and several ways to seek help, including non-verbal and private routes.
- Staff create trusted relationships without promising secrecy or creating inappropriate dependency.
- Pupil voice informs risk assessment, support and policy review.
- Children who report harm receive feedback about what can be shared and are not made to feel ashamed or troublesome.
- Concerns arising in lessons are reported immediately through normal safeguarding procedures.

13 Safer recruitment and ongoing suitability

Harmony follows KCSIE 2026 Part Three and its Safer Recruitment Policy. At least one person conducting an interview has completed appropriate safer-recruitment training. Recruitment explores motivation, values, suitability, gaps and discrepancies and includes all required identity, right-to-work, qualification, prohibition, overseas, DBS and barred-list checks.

Regulated activity and volunteers

The Crime and Policing Act 2026 removed the former supervision exemption from regulated activity. A volunteer who teaches, trains, instructs or supervises children on more than three days in a 30-day period, or overnight, is in regulated activity even when supervised. Harmony will determine the role correctly and obtain the level of DBS and barred-list check permitted and required by law before the activity begins. The same safeguarding standards apply to self-employed staff, for whom KCSIE 2026 clarifies eligibility for checks.

- Do not allow a barred person to engage in regulated activity.
- Obtain written assurance and relevant checks for agency, supply, contracted and trainee-teacher arrangements; responsibility is shared and cannot be outsourced.
- Record checks accurately and re-check suitability where legally required or concerns arise.
- Use risk assessments only where KCSIE permits a person to start before a certificate is seen; never use one to bypass a required barred-list check.
- Make a DBS referral when the legal harm test and removal conditions are met, including where the person resigns or would have been removed. Consider referral to the Teaching Regulation Agency where appropriate.

Visitors contractors and third parties

Visitors are identified, signed in, given safeguarding information and supervised according to risk. Contractors' identity and checks are verified. Where premises are used for non-Harmony activities, written arrangements must set out safeguarding responsibility. Concerns about an external provider are acted on and referred; contractual responsibility never displaces statutory safeguarding action.

14 Allegations and concerns about adults

Harm threshold

A concern may meet the harm threshold where an adult working or volunteering with children has behaved in a way that harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved in a way indicating they may pose a risk; behaved or may have behaved in a way indicating they may not be suitable to work with children; or behaved in a discriminatory manner connected with a protected characteristic under the applicable local LADO criteria.

8. Report immediately to the designated manager for allegations. If the concern is about that person, report to the other proprietor or directly to the LADO.
9. Do not investigate, interview witnesses, alert the adult or promise an outcome before LADO advice, except for immediate safety steps.
10. Contact the LADO without delay and before disciplinary investigation; contact police or social care immediately where required.
11. Agree risk management, communication, support, record keeping and investigation with the LADO and relevant agencies. Suspension is not automatic and alternatives must be considered.
12. Record the outcome using the recognised categories and make DBS or TRA referrals where duties are met.

These procedures include agency and supply staff, self-employed staff, trainee teachers, volunteers and contractors. Harmony and the employing or training organisation share safeguarding responsibilities and must cooperate fully.

Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the staff code of conduct but the behaviour does not meet the harm threshold. It includes a sense of unease or "nagging doubt". Examples include over-friendliness, favourites, personal-device photography, secluded one-to-one contact, inappropriate gifts or sexualised, intimidating, offensive or discriminatory language.

- Report to the DSL or designated manager promptly. Self-referral is encouraged.
- Record the concern, context, action and rationale confidentially.
- Check for patterns across records and organisations where lawful.
- Seek LADO advice where the threshold is uncertain.
- Respond proportionately through guidance, training, conduct or disciplinary processes.

Whistleblowing

Staff must raise poor or unsafe practice and failures in safeguarding. Where internal routes are unavailable, compromised or ineffective, staff may contact the LADO, commissioner, Ofsted where relevant or the NSPCC advice line. No worker should suffer retaliation for a protected disclosure made in good faith.

15 Reasonable force and restrictive interventions

Harmony prioritises prevention, co-regulation, environmental adaptation and de-escalation. Reasonable force or another restrictive intervention is used only where lawful, necessary and proportionate, for the least time and with the least restriction. It must never be used as punishment. Staff consider SEND, communication, trauma, medical needs, age, size, dignity and equality duties.

- Staff must not obstruct airways, breathing or circulation or apply pressure to the neck or abdomen. Ground restraint carries particular risk and must be ended or repositioned as quickly as possible.
- Seclusion is not a disciplinary sanction. If exceptionally used as an immediate safety measure, the space must be safe, the child continuously supervised and free to leave as soon as risk reduces.
- Staff likely to use interventions receive suitable training and follow individual risk and behaviour-support plans, while recognising that each incident requires a fresh dynamic assessment.
- Medical attention, welfare support, debrief and relationship repair are offered after an incident, including to witnesses where needed.
- Complaints or allegations about force follow safeguarding and complaints procedures.

Recording and reporting duties from April 2026

Every significant use of force must be recorded in writing as soon as practicable, normally the same day, under section 93A of the Education and Inspections Act 2006. Every seclusion or restraint incident, including non-contact restraint, must also be recorded under the 2025 Regulations. Parents must be informed in writing as soon as practicable, normally the same day, subject only to the statutory serious-harm exception. The commissioning body is informed under placement arrangements.

Records include names; date, time, location and duration; the child's needs and SEN status; antecedents and triggers; prevention and de-escalation; type and degree of intervention; why it was necessary and proportionate; injury, medical care and other impact; support; parental notification; child and witness accounts where appropriate; and review actions. Leaders analyse patterns and disproportionate impact and update plans.

16 Premises off-site work sport and media

Premises and site safety

Safeguarding risk assessments cover the busy road, gates and access, machinery or works, shared primary and secondary spaces, toilets and private areas, visitors, dogs and animals, fire and lockdown arrangements. Risks are reviewed when buildings, rooms or use change. A closed gate, reception control and visitor process support safety without creating unlawful confinement.

Off-site and sport

Out & About, sports, visits and transport are covered by proportionate risk assessment, staffing, medical and emergency arrangements, headcounts and communication. Coaches and venues are checked appropriately. Changing, photography, physical contact and one-to-one coaching are specifically considered. The same reporting process applies off site.

Images audio and video

- Obtain the appropriate child and parental permissions and respect withdrawal.
- Use authorised equipment, accounts and storage only.
- Avoid names or identifying information unless specifically approved.
- Ensure clothing, context and activity preserve dignity.
- Pupils must not record others without permission.
- Any concerning, sexualised, covert, altered or AI-generated image is reported immediately.

17 Training supervision and support

- All staff receive induction before unsupervised work, including Part One, local procedures, CPOMS, whistleblowing, online safety, filtering and monitoring, mobile phones and staff conduct.
- Safeguarding knowledge is updated as required and at least annually; training is adapted to role and verified for understanding.
- DSLs and deputies train at least every two years, undertake Prevent training and refresh knowledge at least annually.
- Staff involved in difficult cases, disclosures or incidents receive confidential supervision and wellbeing support.
- Attendance, completion and follow-up are recorded. Missed training is rescheduled promptly.
- Learning from incidents, local reviews, audits and pupil voice informs practice.

18 Monitoring review and equality

The policy is reviewed at least annually and sooner after a serious incident, local learning review, complaint, audit, legal or guidance change, change to provision or identified weakness. Review considers implementation, not only wording.

- quality and timeliness of referrals and records
- children's experience and accessibility of reporting routes
- attendance and children absent from education
- child-on-child and prejudice-based harm
- online safety, AI, mobile-phone practice and filtering and monitoring
- allegations, low-level concerns and safer recruitment
- use and disproportionality of restrictive interventions
- information sharing and secure file transfer
- staff training, DSL capacity and cover
- commissioner and multi-agency feedback

Harmony will make reasonable adjustments so children and adults with disabilities or communication needs can understand and use this policy. A child's race, disability, sex, religion or belief, sexual orientation, gender questioning, language, care status or family circumstances must never lead to lower expectations of safety or credibility.

19 Linked policies

- Staff Code of Conduct and Safer Working Practice
- Safer Recruitment and Single Central Record
- Behaviour and Anti-Bullying
- Online Safety Acceptable Use Filtering and Monitoring and Mobile Phones
- Whistleblowing
- Complaints
- Allegations and Low-Level Concerns
- Data Protection Privacy Records Retention and Information Sharing
- Restrictive Interventions and Positive Behaviour Support
- Health and Safety,
- Educational Visits,
- Transport
- Equality
- Supporting pupils with medical conditions
- Visitor
- Lone Working
- Lockdown
- Photography Media and Social Media
- School Dog

Appendix A Staff action flowchart

1 Notice or receive	Concern, disclosure, injury, behaviour, absence, online alert or third-party information.
2 Make safe	Call 999 for immediate danger or urgent medical need. Preserve evidence.
3 Report now	Tell the DSL or deputy immediately. If unavailable or action is not taken, refer directly.
4 Record	Enter on CPOMS promptly and factually. Recording never delays action.
5 Decide and refer	DSL assesses support, Family Help, section 17 or section 47, police, Channel or other referral.
6 Support and share	Hear the child, plan safety, share proportionately and tell the commissioner where safe.
7 Review and escalate	Confirm outcome, monitor impact and escalate if risk remains or response is inadequate.

Appendix B Minimum safeguarding record

- Child's full name, date of birth and commissioning body
- Date, time, location and source of concern
- Exact words used by the child and any communication support
- Observed facts, injuries and body map where relevant
- Open questions asked and exact responses
- People present and witnesses
- Immediate safety or medical action
- Parent or carer contact, or reason not contacted
- Information shared, recipient, time and purpose
- Risk assessment, decision, referral and decision rationale
- Outcome, feedback, ongoing support, review date and escalation
- Name, role, signature or secure system attribution

Appendix C 2026 implementation checklist

Action	Owner	Evidence
Issue KCSIE 2026 Part One in full to every staff member and confirm understanding	DSL	Signed or electronic record
Update induction and annual training for Family Help prejudice-based harm VAWG AI imagery and modern slavery	DSL	Training materials and attendance
Confirm confidential DSL cover and handover route	Senior leaders	Published rota and tested route
Review filtering and monitoring on all managed connected devices and locations	SLT DSL and IT	Dated review checks actions
Complete AI product and use risk assessment	SLT DSL and IT	Approved register and risk assessments
Update mobile phone and personal device procedures	Senior leaders	Policy staff and pupil briefing
Update safer recruitment for Crime and Policing Act 2026 regulated activity changes	Recruitment lead	Templates SCR and training

Action	Owner	Evidence
Implement same-day written recording and parental reporting for force seclusion and restraint	Senior leaders	Forms logs and staff briefing
Confirm LADO SPA and out-of-hours details	DSL	Dated contact check
Review sport premises third-party use and off-site risk assessments	Health and safety lead / DSL	Current risk assessments
Update child-on-child procedure for HSB continuum and all nude-image incidents	DSL	Procedure and staff briefing
Review linked policies for consistency	Policy owners	Policy register

Appendix D Authoritative links

Keeping Children Safe in Education 2026: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working Together to Safeguard Children 2026: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

What to do if you are worried a child is being abused: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Information sharing advice for safeguarding practitioners: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Prevent duty guidance: <https://www.gov.uk/government/publications/prevent-duty-guidance>

Use of reasonable force and other restrictive interventions: <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Working together to improve school attendance: <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

Statutory guidance for alternative provision: <https://www.gov.uk/government/publications/alternative-provision>

KCSIE 2026 full PDF:

https://assets.publishing.service.gov.uk/media/6a9081309a177a1decf97b00/Keeping_children_safe_in_education_2026.pdf

Working Together 2026 summary of changes: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2/working-together-to-safeguard-children-2026-summary-of-changes>

RBWM Safeguarding Partnership: <https://www.rbwmsafeguardingpartnership.org.uk/>

Report child abuse: <https://www.gov.uk/report-child-abuse>

Searching screening and confiscation: <https://www.gov.uk/government/publications/searching-screening-and-confiscation>

Modern slavery statutory guidance: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

FGM mandatory reporting: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Forced marriage guidance: <https://www.gov.uk/guidance/forced-marriage>

Educate Against Hate: <https://www.educateagainsthate.com/>

NSPCC Report Abuse in Education helpline: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/>

Links were checked in September 2026. Staff should use the current official page if a linked document is replaced or moved.

Appendix E Approval and review record

Approved by	
Approval date	September 2026

Approved by	
Signature	
Review completed by	
Next review date	September 2027 or earlier

Professional note: This policy is based on national and local sources available at the review date. Harmony should obtain specialist legal or local-authority advice where the application of duties to its precise registration or contractual status is uncertain.