



Safeguarding and Child Protection Policy

Policy Statement

At The Loddon School, we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment.

A culture in which all adults take child welfare and child safety matters seriously is crucial to The Loddon School.

This policy seeks to provide staff, trustees and visitors with a clear framework and guidance about how we will ensure the safety of children at our school.

We will always act in the best interest of the child.

Table of Contents

Safeguarding and Child Protection Policy	1
Purpose	3
Aims.....	3
The Loddon School context	4
The Loddon School's responsibilities	6
Monitoring	7
Staff responsibilities	8
Designated Safeguarding Lead & Deputies responsibilities	9
Responsible Individual responsibilities	10
Other strategies for preventing a child coming to harm	10
Recognition and investigation	10
Procedure for reporting a concern about a child	10
Procedure following the report of a concern.....	11
Allegations against adults at The Loddon School.....	12
Linked policies	13
Appendices	13
References.....	13
Appendix 1 – Procedure for reporting a concern about a child	15
Appendix 2 – Types of Abuse	16
Self-injury	17



Children Missing Education (CME)	17
Child Sexual Exploitation (CSE).....	17
Child Criminal Exploitation (CSE).....	17
Domestic abuse	18
So-called 'honour-based' abuse (HBA).....	18
Female genital mutilation (FGM)	18
The Prevent Duty.....	19
Child-on-child abuse.....	19
Other forms of abuse listed above	19
Appendix 3 - Flow chart for child protection procedure	20
Appendix 4 – The Low-Level Concerns (LLC) – policy and procedure	21
1. Introduction.....	21
2. Summary	21
3. Keeping Children Safe in Education September 2025	21
4. Clarity around allegation vs low-level concern vs appropriate conduct	22
5. Storing and use of low-level concerns and follow-up information	23
6. Process to follow when a low-level concern is raised	24
7. Action to be taken in event of a Low-level concern	25
8. Low Level Concern Reporting.....	26
9. Key Reference Document	26
Document changes table.....	26

This policy is directed to meet the particular needs of the children at The Loddon School.

At The Loddon School, the Designated Safeguarding Lead is Tim Clark, Director of Care. In his absence the Designated Deputies are Kelly Simpson, Joanna Emerson, Maciej Okolotowicz, Pam Dobson and Laura Lovett. This Policy shall be updated annually by the policy lead Tim Clark.

The trustee designated for safeguarding is Joy Wake. Any concerns may be raised to any of the above persons or to the Hampshire Safeguarding Children's Partnership (HSCP) or LADO with whom The Loddon School have a close working relationship.

Parents are made aware of this policy during the admissions process. They can access this information on the website or receive a printed copy upon request. The Children's Guide is accessible in each of the children's homes, it provides information, on this policy for the children who are accommodated at TLS.



Purpose

This introduction outlines the difficulties experienced by the children and young people and justifies the consequent need for intensive staffing. The potential vulnerability of the children is recognised in this policy, the aim of which is to ensure that all children and young people are safeguarded.

The Loddon School fully recognises its responsibility to safeguard and promote the welfare of children and young people at our school. The purpose of this policy is to provide staff (including agency staff), visitors and trustees with the guidance they need to keep children and young people safe in our school and to inform parents and guardians of our strategies for safeguarding their children and young people while they are in our care.

We recognise that children and young people have a right to feel safe and secure, and cannot learn effectively unless they do so. Children can be harmed either by direct acts (by parents, carers and other people) or failure to provide proper care or both. Children may suffer abuse (neglect, emotional, physical, financial, sexual or other forms of abuse) or a combination of such types of abuse. The Human Rights Act 1998 stipulates that all children and young people have a right to freedom from 'inhuman and degrading treatment' (an absolute right). This policy includes guidance in relation to dealing with allegations involving staff in the home, online safety and self-injurious behaviour.

In accordance with Keeping Children Safe In Education 2025 we define safeguarding and promoting the welfare of children as:

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

Aims

These procedures apply to all staff (those who work directly with the children and all those who do not), trustees and visitors to the school. The aim of our procedures is to prevent children and young people from being harmed and to safeguard and promote the welfare of children and young people at this school in the following ways:

- Raise awareness of child protection and safeguarding roles and responsibilities with staff, trustees and visitors.
- Develop, implement and review procedures in our school that enable all staff to identify and report cases, or suspected cases, of abuse.
- Support children and young people who have been abused in accordance with their agreed child protection plan.
- Ensure the practice of safer recruitment in checking and recording the suitability of staff to work with children and young people.
- Establish a safe environment in which children and young people can live, learn and develop.



- Ensure that allegations or concerns against staff are dealt with in accordance with Department for Education (DfE) and Hampshire Safeguarding Children's Partnership guidelines.

The Loddon School context

Contextual safeguarding encourages us to consider a child's well-being and safety within their specific context. The Loddon School provides significant protective factors when considering each child's safeguarding context – children are protected from potential negative influences of poor peer group, community or family influences. However, their context also comes with differing potentially increased risks. The NSPCC details the following vulnerability factors:

- Communication barriers
- Misunderstanding the signs of abuse
- Lack of education on staying safe
- Increased isolation
- Dependency on others
- Inadequate support

Children who attend The Loddon School can be considered at greater potential risk of the above vulnerabilities.

The Loddon School is both an independent special school and a children's home but, throughout this policy, will be referred to as The Loddon School. The Loddon School educates and cares for children and a small number of young adults; this policy refers to all children and young adults accommodated at The Loddon School. All references to children in this policy also refer to the young adults accommodated at the school.

The Loddon School cares and educates children and young people who engage in high-risk restrictive behaviour (behaviour that restricts the child's opportunities to learn or develop), and who experience severe and complex learning difficulties and usually autism.

Most children and young people will have been excluded from their local special school or will have been previously separated from the rest of their class or assigned extra staff. Children will typically have used their restrictive behaviours to avoid class-based activities and will find formal classroom teaching aversive. They are often resistant to perceived demands; this limits their ability to engage in learning, social and wellbeing activities. For many children and young people residential respite provision will have broken down and the family living situation will most often have become too difficult to sustain.

The Loddon School's Admission Policy is in alignment with the Equality Act 2010. Children are assessed against the school's 'Essential Criteria for Admission' which includes a range of restrictive behaviours. To be considered for admission to the school, children and young people will have been seen to use a number of these behaviours to get their needs met.

All children and young people have an Education, Health & Care Plan. Many children have been diagnosed with autism, epilepsy, ADHD or other health needs. All children and young people need



high levels of adult support both day and night to keep them safe to minimise the risks to both themselves and others.

Most children and young people are non-verbal and on admission have few strategies for making their needs known beyond using a range of restrictive behaviours. Often children and young people need time to process information.

Many children and young people experience anxiety that manifests itself in a variety of behaviours such as aggression, flopping to the ground, running off, perceived non-cooperation, making loud noises, inappropriate removal of clothing, the intentional passing of bodily fluids, or sleep difficulties.

The children and young people have difficulties making sense of their world and have little awareness of events beyond their own experiences. They typically have challenges in engaging socially. They have difficulty in understanding concepts and in responding appropriately to the consequences of their behaviours.

We must remember that the five statutory principles of the Mental Capacity Act (2005) apply to young people aged 16 and over:

1. A person must be assumed to have capacity unless it is established that they lack capacity.
2. A person is not to be treated as unable to make a decision unless all practicable steps to help him to do so have been taken without success.
3. A person is not to be treated as unable to make a decision merely because he makes an unwise decision.
4. An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in his best interests.
5. Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

For the avoidance of doubt, the children and young people are unlikely to have the capacity to give informed consent of most significant decisions in relation to their care, health, education, living arrangements or finances; of course, however, this cannot be assumed.

In most cases, a young person's parents count as their "best interests" consultees if they lack capacity, and no step can be taken in relation to their wellbeing or treatment without consulting those persons.

At The Loddon School children are encouraged to keep themselves safe. Several aspects of the PLLUSS curriculum focus on improving the child's ability to stay safe.

The school will work openly with parents as far as possible. Referral to Children's Social Care, Hampshire Safeguarding Children's Partnership or the Police, prior to notifying parents is usual as a means of maintaining an open working approach and seeking external input to confirm intended action in the child's best interests.

The Loddon School recognises the direct links being made between children's mental health, and safeguarding and child protection. Children at the school have complex diagnoses - regularly already



having been diagnosed with mental health concerns prior to admission and during their time at the school. These concerns are always addressed, with parents and local authority input through normal health channels. The school's regular review processes (child in care reviews, looked after child medicals and 6 monthly GP reviews), high staff ratios and strong staff advocacy for meeting the child's needs, provide good protective measures in ensuring mental health concerns are addressed robustly.

Online safety is an important matter for children at The Loddon School. The Online Safety policy details measures in place to keep the children safe from online risk. It incorporates the four areas of online risk: Content, Contact, Conduct and Commerce. All children's devices are linked through the school's WiFi network and therefore benefit from the school's content filtering and monitoring system. This system is reviewed regularly to ensure it is robust but not overly restrictive. Children typically have little interest in contact with unknown people or potential risks associated with online commerce. Teaching and learning about online safety is supported at appropriate levels. Day-to-day risks to the children are necessarily managed through ongoing staff support and behaviour management. The school's Online Safety policy also contains detail about our approach to online safety, staff's differing responsibilities in relation to it and the practicalities and processes of online monitoring and filtering. The school is conscious of the growing concern around use of generative AI and intends to keep abreast of the Department of Education's product safety expectations guidance to consider the risks to Loddon children and young people and to ensure our policy and practice continue to keep the children safe from this growing risk.

The Loddon School's responsibilities

The Loddon School recognises that because of their day-to-day contact with children and young people, staff are well placed to observe the outward signs of abuse.

N.B. Interactions between young people over the age of 16 may not necessarily be criminal or indicative of abuse when due regard is given to the developing capacity of the individual and their ability/inability to give informed consent.

The school will therefore:

- Recognise the specific vulnerabilities of The Loddon School children and young people.
- Establish and maintain an environment where children and young people feel secure, are encouraged to communicate and are listened to.
- Ensure children and young people know that there are adults in the school whom they can approach if they are worried about any problems. The voice of the child is paramount & staff should respond to any concerns or allegations raised.
- Treat all disclosures with the strictest confidence. Care should be taken not to unlawfully breach the young person's right to confidentiality in so far as they may have limited capacity to express their wishes about this. However, staff should never promise confidentiality of a disclosure of abuse.
- Follow the procedures set out by the Hampshire Safeguarding Children's Partnership and take account of guidance issued by the DfE.



- Ensure that there is a senior designated person/Designated Safeguarding Lead (DSL) supported by a number of designated deputies.
- Operate a policy of careful selection of employees (Safer Recruitment). Three references are taken up, one prior to interview and at least two further ones. A prospective employee is required to work alongside a house leader for a day before a decision on employment is made (at *no* point are they left unsupervised with the children and young people).
- Take up DBS & Children's Barred List checks and references on all employees prior to employment.
- Operate a three-month probationary period for all new staff.
- Have a high staff ratio thus minimising the need for a member of staff to be alone with a child.
- Provide intensive staff training that includes safeguarding – this takes the following forms:
 - one month's mentoring/shadowing
 - 5 full days of orientation and induction training
 - regular supervision and annual appraisal
 - refresher training at least every year – staff in direct contact receive three refreshers per year.
 - external courses
 - Provide training in the Loddon proactive approaches; the PLLUSS (Personalised Learning for Life Using Supportive Strategies) curriculum and PROACT-SCIPr-UK®, a package of staff training which is accredited within the BILD Code of Practice. Physical interventions taught as part of the PROACT-SCIPr-UK® curriculum are the only ones permitted. (See also Physical Intervention Policy & Positive Behaviour Support Policy).
 - Provide training in the principles of Mental Capacity Act (2005) and Deprivation of Liberty Safeguards
- Facilitate visits from the health professionals from various community health teams and the school G.P.
- Facilitate frequent visits from each child's own local authority social worker.
- Ensure the child's social worker is informed of physical or restrictive interventions that have had to be used with the child as well as informing them immediately of any harm they may have come to during an incident or at any other time.
- Have "friendly" police visits.

Monitoring

The Leadership Team monitor all incident reports weekly and identify where further or different action may need to be taken to safeguard a particular individual. This will include where issues or concerns need to be notified to other agencies (e.g., local authorities, Hampshire Safeguarding Children's Partnership, Ofsted, Charities Commission). Where actions need to be taken above and beyond the child's current written Risk Assessment and Support Guidelines, the Local Authority and parents will be notified immediately and then the guidelines changed with their agreement.



Likewise, practices will be reviewed monthly with restrictions reduced as soon as safe to do so. Every child's Risk Assessment and Positive Behaviour Support Guidelines will be aimed at reducing restrictive behaviours and the need for restrictive practices.

Local authorities (social workers or placement officers) are kept informed of each child's safety and wellbeing. This includes information about critical incidents and potentially restrictive practices. When requested, incident reports are sent at least monthly via email by the Behaviour Support and Analysis team.

The Children's Homes (England) Regulations 2015 do not prevent a child being deprived of their liberty, where that deprivation is authorised in accordance with a court order. The Loddon School and DSL recognises that in exceptional circumstances where there might be concern as to the proportionality of restrictive measures believed to be being taken in the child's best interests, it has an obligation to alert the local authority that is commissioning the care, as well as the Local Children's Safeguarding Board, in relation to the statutory authorities considering whether an application needs to be made to the Court of Protection.

Staff responsibilities

The Loddon School children's vulnerability enhances the need for staff to adhere to the below in maintaining a safe open working approach. All staff must adhere to the following in meeting their safeguarding obligations:

- To protect the children from harm and potential harm.
- To understand and follow this policy.
- Understand the content of Part One and Annex B of Keeping Children Safe in Education – [use this link to see the most up to date copy](#).
- To attend all Safeguarding, MCA and DoLS training.
- To prevent the children engaging in potentially harmful behaviour wherever possible.
- To be aware of the signs and symptoms of abuse.
- Maintain an attitude of 'It could happen here' in relation to safeguarding and child protection concerns.
- To know the reporting procedures if any abuse is suspected, witnessed or disclosed.
- To immediately report any concerns about abuse, a child's safety or welfare to the DSL or DSL deputies.
- If the disclosure is an allegation against a member of staff, they will follow the allegations procedures attached to this policy (Appendix 1).
- Staff working directly with the children monitor marks on a child's body during personal and intimate care routines and complete body maps for children and young people at least on a weekly basis.
- To make it clear to the DSL or a DSL deputy if they do not understand any of the information contained in Part One and Annex B of Keeping Children Safe in Education (KCSIE).
- Maintain an open working approach: avoid situations where there are no other staff around; keep doors open when alone with a child in a room (ajar in the case of personal or intimate care); communicate actions and intention to the child and others around; communicate well



with colleagues so they support you in maintaining this open working approach – adherence to these measures increases in importance when supporting the children in vulnerable situations, for example, a child having a bath.

- To understand the risks involved with Loddon children and young people using the internet and to supervise them accordingly – report any issues relating to online safety. [See Online safety policy].
- To follow the training given regarding positive approach/interaction and physical interventions (including those interventions that may be deemed a restraint) using only PROACT- SCIPr –UK®.
- To adhere to the policy for taking children and young people off school premises which includes a risk assessment for every outing.
- To treat all safeguarding related information as confidential and only discuss safeguarding matters with others who need the information in pursuance of maintaining and protecting the safety and welfare of a child or group of children.

These responsibilities extend to all staff at The Loddon School, including agency staff and volunteers.

Designated Safeguarding Lead & Deputies responsibilities

In this school the Designated Safeguarding Lead is Tim Clark – Director of Care. In his absence the Designated Deputies are Kelly Simpson, Joanna Emerson, Maciej Okolotowicz, Pam Dobson and Laura Lovett.

The DSL and deputies will:

- Foster a culture in which all staff place great importance on child safety and welfare matters, have high aspirations for Loddon children, and place the children's best interests as paramount in their thoughts and actions.
- Ensure that the Trustees understand their responsibilities under s.175 of the Education Act 2002
- Ensure staff have received appropriate, regular training.
- Ensure every member of staff and trustees know the name of the Designated Safeguarding Lead (DSL) and their deputies (DDSLs), their role and their contact details.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns.
- Ensure that whole school attend training regularly so that every member of staff can fulfil their child protection responsibilities effectively and to comply with the requirements set out in 'Working Together to Safeguard Children' December 2023(HM Government) and 'Keeping Children Safe in Education', September 2025(DfE).
- Keep written records of child protection/safeguarding concerns that are kept securely and separately from the main pupil file and use these records to assess the likelihood of risk. All data stored will comply with the Data Protection Act 2018 and UK GDPR Regulations.
- Complete Designated Safeguarding Lead training every two years.



Responsible Individual responsibilities

The Responsible Individual of The Loddon School is Joy Wake – Safeguarding Trustee.

The responsible individual will:

- supervise the management of the home
- maintain oversight of safeguarding practices and regulated practice.

Other strategies for preventing a child coming to harm

- Parents taking their child out are requested to sign their child in and out of the school and make a brief written evaluation of the outing.
- The Loddon School requires consent from parents for anyone other than themselves or Loddon staff to take a child out of the school premises.
- All visitors, contractors and volunteers must report to reception to be signed in. They will be accompanied by a member of staff if they do not have the relevant DBS check.
- The Loddon School provides a team of 'waking' night staff, additional evening workers and a 'senior on-call sleep-in' each night. In addition to this a member of the Leadership Team is available off-site by phone.
- The Loddon School requires that each child be checked regularly throughout the night in line with the individual guidelines and risk assessments.
- The Loddon School employs five DSL deputies all of whom are in dual roles. The Registered Manager, who is the DSL, has overall responsibility for monitoring childcare practice within the school and children's homes.

Recognition and investigation

All staff are provided with the knowledge of how to recognise and report child abuse.

The Loddon School follows its procedure whereby preliminary enquiries are made immediately in response to all allegations - whether reported by a child, a member of staff or by an external agency.

Procedure for reporting a concern about a child

- Ensure the safety of the child.
- Report the concern, without delay, directly to the DSL, a designated deputy, or a senior member of staff in their absence.
- Staff must make and record initial observations which will be used in any subsequent investigation (including court proceedings) as soon as possible and within 24 hours of occurrence. The observations should be written on the Safeguarding Concern form, located on The Loddon online Hub, and a 'body map' used to indicate any injury. This record should include:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved
 - Any injuries



- Factual explanations given by the child/adult
- What action was taken
- Any actual words or phrases used by the child or member of staff involved.

The records should be recorded on the online safeguarding concern form. Once written it must be printed, signed and dated by the author, then rescanned to be saved in the appropriate secure safeguarding concerns folder.

Procedure following the report of a concern

- The DSL or in their absence the DDSL will make sure the child is safe.
 - If an allegation is made about a member of staff it may be considered appropriate to suspend that member of staff to keep them safe while the matter is being investigated. Suspension will be risk assessed by DSL (or a Deputy DSL) and a member of HR. As a matter of course, the incident should not be investigated with member of staff without prior advice being sought from the designated officer (LADO). It may be appropriate to allow the member of staff to give an account of the situation to a senior member of staff. Notes will be taken, dated and signed by both parties. The senior staff must not ask leading questions.
 - The DSL will take responsibility for initiating any referrals.
 - The DSL will consider the need for immediate medical intervention.
 - The DSL will consider the need for police involvement in keeping with the [National Police Chief's Council's 'When to call the Police' guidance](#).
 - The child's social worker or the 'home authority' duty social worker will be contacted immediately
 - If it is considered abuse may have occurred against a child, the DSL will inform the Hampshire Safeguarding Children Partnership (HSCP). The DSL will take advice and agree the appropriate next steps with the Designated Officer (LADO) and social worker of 'home authority'. In the case of a concern related to a young person accommodated at TLS who is 18 years or above Hampshire Adult Safeguarding Services will be informed as well as Hampshire Child Protection Services.
 - Ofsted will be notified through a regulation 40 notification.
 - The school will cooperate with any actions identified by a Hampshire Safeguarding Children Partner (HSCP), including medical investigation or calling the police.
 - The child's parents/guardians will be notified as soon as practically safe to do so.
 - The DSL or CEO will notify the Designated Safeguarding Trustee of the incident/allegation who will in turn confirm whether a referral should be made to the Charity Commission.
 - In the unlikely event that the CEO/DSL are unavailable, one of the designated deputies will take on the above responsibility and tasks.
 - Consideration will be given as to whether the concern meets the threshold for a DBS referral. If necessary, the DSL will be responsible for ensuring this referral is made.
- Any member of staff who feels the DSL or deputies are not responding appropriately to any allegation should contact the Hampshire Safeguarding Children Partnership or Ofsted or the designated safeguarding trustee immediately.

Holding and Sharing Information – page 176 of KCSIE, DSLs should be able to:



'keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.' This should be recorded securely in the safeguarding concerns folder.

Staff are encouraged to follow The Loddon School's Whistleblowing policy if they have more general concerns about any practice at The Loddon School including, importantly, the handling of any safeguarding concern. In matters of child safety and welfare, it is crucial that the internal reporting procedures detailed in this policy are adhered to, so any action required to safeguard the safety and welfare of a child can be taken immediately.

Allegations against adults at The Loddon School

Complaints and concerns in relation to an adult will be handled in accordance with The Loddon School's Staff Code of conduct, Disciplinary, Complaints and Performance management policies as appropriate. Such complaints and concerns could include: -

- Breaches of the Staff Code of Conduct
- Failure to follow policy, procedure or guidance
- Any breach of data protection or confidentiality
- Poor behaviour support/management
- Inappropriate use of social media
- Misadministration of medication
- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.

All allegations against staff, however, will be handled in accordance with the above *Procedure following the report of a concern*. An allegation is defined by KCSIE as an adult working with a child having:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Consideration of whether a complaint or concern also constitutes an allegation will need to be taken. Accordance with this policy will take precedence in cases where the concern or complaint also meets the definition of an allegation.

Low Level concerns and allegations that relate to the- CEO or Director of Care should be reported directly to a member of the trustee board as indicated in Appendix 1. In these situations, the Chair of trustees will coordinate investigation and will take actions listed in the 'Procedure following the



report of a concern' section above. Seeking advice from the Hampshire DO will be necessary in this incidence to ensure the concern is robustly addressed.

Linked policies

The below policies and procedures must be adhered to as their requirements have implications and measures that are important to The Loddon School and staff in meeting their safeguarding responsibilities:

- Recruitment and selection of staff
- DBS policy
- Safeguarding log entry summary procedure
- Safeguarding concern procedure
- Whistleblowing
- Online Safety policy
- Positive Behaviour Support policy
- Physical Intervention policy
- Intimate Care
- Anti-bullying policy
- Health and safety policy
- Sex and relationships policy
- Equalities policy
- Medication administration policy
- Admissions Policy

Appendices

1. Procedure for reporting a concern
2. Types of Abuse
3. Flow chart for child protection procedure
4. Low level concern policy and procedure

References

- Working Together to Safeguard Children (HM Govt., December 2023)
- Keeping Children Safe in Education (DfE, September 2025)
- The Children Act 1989 and 2004
- Education Act 2002
- The Children's Homes (England) Regulations 2015
- Guide to the Children's Homes Regulations April 2015
- [Hampshire Safeguarding Children's Partnership Procedures](#) (online)
- What to do if you are worried a child is being abused - Advice for Practitioners (HM Govt. 2015)
- Mental Capacity Act (2005)
- Deprivation of Liberty Safeguards



- Information on Sharing (HM Govt. 2015)
- The Children and Families Act 2014
- The Education (Independent School Standards) Regulations 2014
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Data Protection Act 2018/UK GDPR
- Human Rights Act 1998
- Equality Act 2010
- Prevent strategy 2015
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended.

The procedures of the Hampshire Safeguarding Children Partnership can be accessed at <http://hipsprocedures.org.uk/page/contents>

THIS POLICY IS WRITTEN TO COMPLY WITH THE CURRENT CHILDREN'S HOMES REGULATIONS, QUALITY STANDARDS AND KEEPING CHILDREN SAFE IN EDUCATION. As a school, we review this policy annually in line with DfE, HSCP & KCSIE guidance.

Approved by the Responsible Individual:

(Joy Wake)

Approved by the Designated Safeguarding Lead:

(Tim Clark)

Date: 21st October 2025

Next Review Date: September 2026



Appendix 1 – Procedure for reporting a concern about a child

Children must feel safe and be safe. Safeguarding the children is everyone's responsibility.

If you see anything that concerns you, you must:

- **Make sure the child is safe.**
- **Immediately report your concern to Tim Clark, Director of Care & Designated Safeguarding Lead (DSL)**
- **In his absence, report to a DSL deputy: Kelly Simpson, Joanna Emerson, Maciej Okolotowicz, Pam Dobson, Laura Lovett or the duty manager on call.**
- **Complete the Safeguarding Concern form found on the Loddon Internet Hub**

If your concern relates either the CEO or Director of Care you must raise your concerns with:

Trustee responsible for Safeguarding and Responsible Individual, Joy Wake
Tel: 077 4762 5773 or joy.wake@googlemail.com; or,

Chair of Trustees, Graham Day
Tel: 077 8553 0658 or grahamday1959@gmail.com

If you are unable to report to the individuals above or are not satisfied your concern has been adequately addressed, you should contact:

Hampshire Safeguarding Children's Partnership

Tel: 0300 555 1384 Or, out of hours: 0300 555 1373

NSPCC Whistleblowing Advice Line

Tel: 0800 028 0285



Appendix 2 – Types of Abuse

Definitions of abuse and neglect – Taken from Keeping Children Safe in Education 2025

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Staff working with children must be aware of the following types of abuse and safeguarding issues and the action required by them in event of a related concern:

Child abduction and community safety incidents
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
County lines
Children and the court system
Children who are absent from education
Children with family members in prison
Cybercrime
Domestic abuse



Homelessness
Mental health
Modern Slavery and the National Referral Mechanism
Preventing radicalisation
The Prevent duty
Channel
Sexual violence and sexual harassment between children in schools and colleges
Serious Violence
So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)
FGM (including the mandatory reporting duty for teachers)
Forced marriage

These are detailed in Annex B of KCSIE. [Use this link to read the most up to date copy of Keeping Children Safe in Education.](#)

Self-injury

Self-injurious behaviour (SIB) involves the occurrence of behaviour that could result in physical injury to one's own body. This type of self-injury can be a way to get needs met or cope with pain, anxiety, and frustration; it can be used to gain attention, tangibles or to meet internal sensory needs.

Children Missing Education (CME)

Children Missing Education is not to be confused with The Loddon School's *Children who run off and are lost* policy and procedures. CME in a typical context is the concern of children's regular non-attendance at school and the question of whether missing school is an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children. Children who attend The Loddon School, of course, have 100% attendance when not spending time with their family.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation (CCE)

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.



Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

By definition, Loddon School staff cannot carry out this type of abuse but a child could potentially suffer this type of abuse when visiting home.

So-called 'honour-based' abuse (HBA)

HBA encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Female genital mutilation (FGM)

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin

Symptoms of FGM:

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Loddon School staff have a statutory responsibility to notify police when they discover that FGM appears to have been carried out on a girl under 18. Staff must personally report cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. Such cases must always be reported to the Police. The duty does not apply in relation to at risk or suspected cases.



The Prevent Duty

Schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Naturally, children at The Loddon School cannot be drawn into terrorism or develop radicalized views. However, staff are trained on the prevent duty and any concern about a member of staff or a child's family member should be discussed with the Designated Safeguarding Lead.

We fulfil our duty to provide the children with a broad and balanced curriculum that aims to prepare them for life. Logically this teaches British values using only basic principles and concepts.

Child-on-child abuse

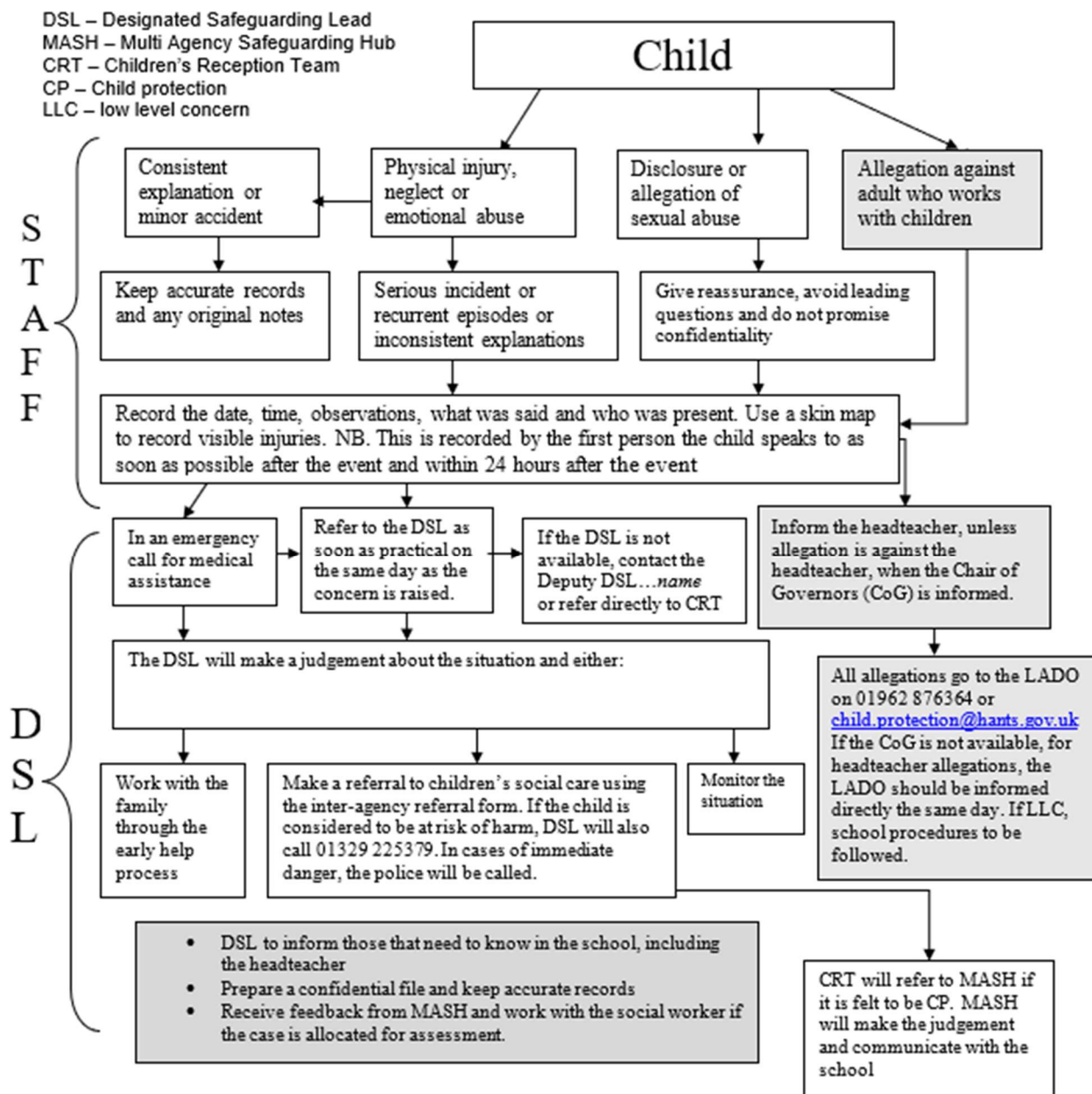
Child on child abuse is form of abuse that differs from a normal context when considering the circumstance for children at The Loddon School. The school recognises the importance of preventing abuse between children but also considers the differing motivation and function for incidents between children and more typically refers to behavioural concerns involving two or more peers as child-on-child *incidents*. Peer-on-peer abuse will not take the normal hidden form typical of this type of abuse. The school's Anti-bullying policy outlines the context of child-on-child abuse for children attending the school.

Other forms of abuse listed above

Staff at The Loddon School are made aware of KCSIE Annex B content through safeguarding refresher training. Staff are to understand how these events occurring in either a child's or staff's life or background will influence the individual. Staff are given details of what each type of abuse might include and how they might recognize the symptoms. More importantly, staff at The Loddon School are given training on preventing any type of abuse.



Appendix 3 - Flow chart for child protection procedure



* In the cases of known FGM, the member of staff who was made aware will also make contact with the police.

** In the case of a concern related to a young person accommodated at TLS who is 18 years or above Hampshire Adult Safeguarding Services will be informed as well as Hampshire Child Protection Services.



Appendix 4 – The Low-Level Concerns (LLC) – policy and procedure

1. Introduction

We take safeguarding seriously at The Loddon School. This includes ensuring that adults who work with children do so in accordance with the ethos and policies set out by the school, including The Loddon Foundation's Staff code of conduct. This policy sets out the detail and processes for staff regarding low-level concerns. As a school supporting particularly vulnerable children and young people, we consider it crucial to maintain a strong culture and climate in relation to safeguarding. It is therefore important that low-level concerns are reported and handled appropriately to support the maintenance of that strong culture and climate. Staff are trained in the need to manage their own behaviour to ensure they are safe to work with Loddon children – the need to maintain an open working approach is crucial – staff must work together to support themselves and each other.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to a child but is however inappropriate. A member of staff who has a concern about another member of staff should verbally inform the Designated Safeguarding Lead (DSL) or a DSL deputy about their concern, and then in writing through the Raise a Safeguarding Concern online form accessed via The Loddon School's online 'Hub'. If these individuals cannot be contacted, the member of staff will inform the duty manager instead; the duty manager will immediately contact a DSL or DDSL – contact details are available on safeguarding posters in numerous locations around school.

3. Keeping Children Safe in Education September 2025

The following excerpt is taken from Keeping Children Safe in Education 2025:

433. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- *is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and*
- *does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:*
- *being over friendly with children*
- *having favourites*
- *taking photographs of children on their mobile phone, contrary to school policy*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or*
- *humiliating children.*



434. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

435. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent 108 or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

436. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

4. Clarity around allegation vs low-level concern vs appropriate conduct

It is important staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern. However, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the DSL, DSL deputies, or the CEO. Staff's behaviour can be considered on the below 'spectrum of behaviour'.

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.



5. Storing and use of low-level concerns and follow-up information

Low level concerns and follow-up information will be stored securely within The Loddon School's safeguarding files with access only by the safeguarding team and CEO. In the case of receiving a letter of concern, investigatory or disciplinary this information will be stored securely within the staff members Employee Relations folder access only by the HR department. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member reporting the concern must keep the information confidential and not share the concern with others apart from members of the safeguarding team and the CEO.

Low-level concerns will not be referred to in employment references unless they have been formalised into more significant concerns, for example, resulting in disciplinary or misconduct procedures.

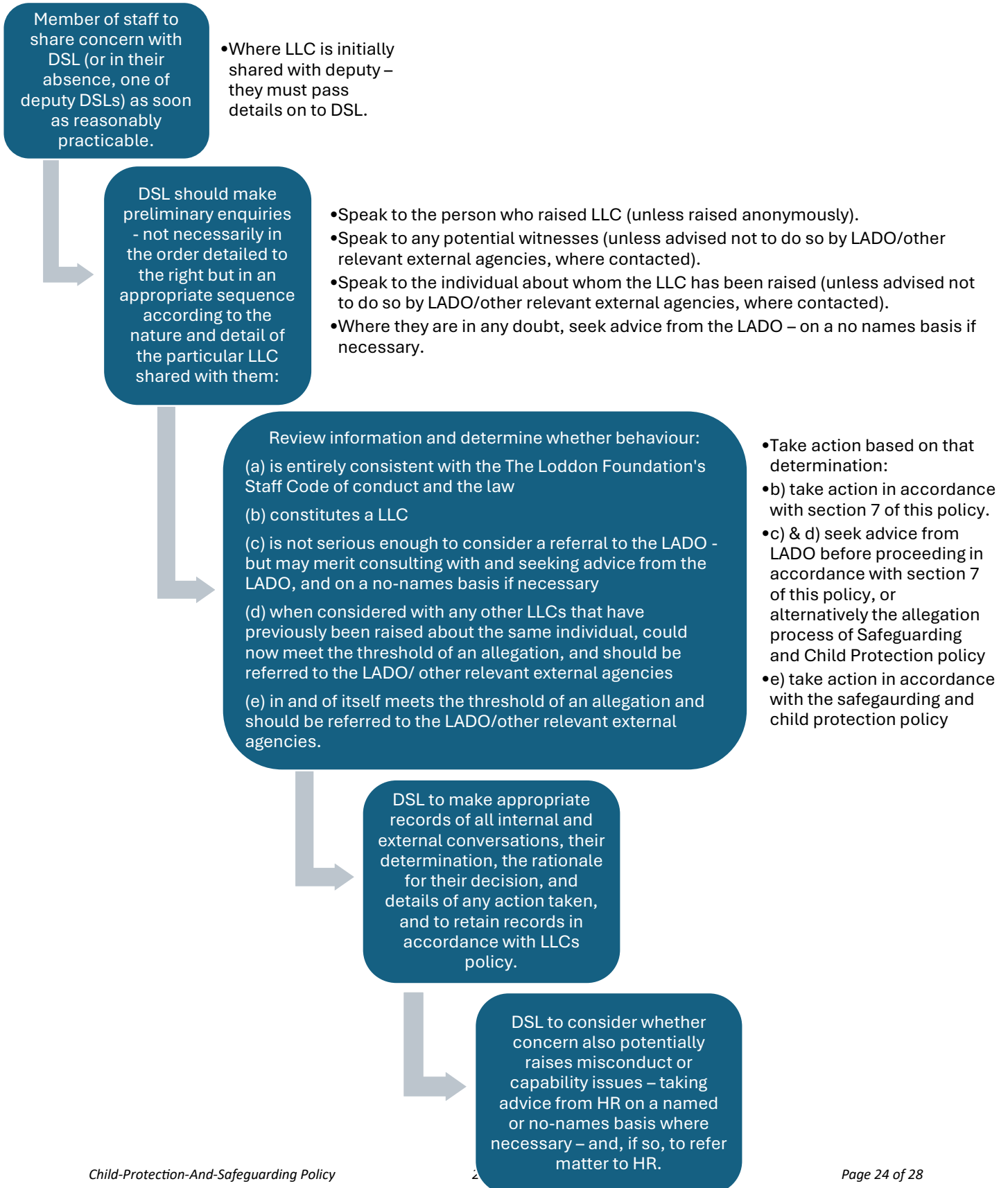
Whenever staff leave The Loddon School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

- a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.



6. Process to follow when a low-level concern is raised





7. Action to be taken in event of a Low-level concern

Low-level concerns should be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns should be done discreetly, and on a need-to-know basis.

Following determination through the aforementioned process, a low-level concern should be responded to in the following way.

- a) Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others, may be most appropriately dealt with by means of management guidance and/or training.
- b) In many cases, a low-level concern can be dealt with through a simple conversation with the member of staff about whom the concern has been raised. It is understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening.¹ A 'values-based conversation' is more likely to be effective and help maintain a positive professional relationship with the member of staff concerned. Such an approach is characterised by an approach of genuine enquiry.²
- c) Any such conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed, may also be appropriate.
- d) Some low-level concerns may also raise issues of misconduct or poor performance. Consideration should also be given as to whether this is the case – by referring to the school's code of conduct and disciplinary policy and taking advice from a member of the HR team. If the CEO or DSL considers the disciplinary policy may be triggered, they should refer the matter to HR. Any such referral should be made by the CEO or DSL having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the CEO or Safeguarding team and HR, so that an holistic view of the individual can be taken. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR.
- e) When a concern is raised, a check of records will be carried out to understand whether any such similar concern has been raised previously. The repeat of a previously addressed concern would increase the need for a more robust approach. Follow-up through the school's disciplinary process may be more appropriate.
- f) This policy applies to any adult working for or on behalf of The Loddon School – so that low-level concerns can be self-reported by and/or shared about them. KCSIE states that where a low-level concern relates to a person employed by an agency or a contractor, that concern will be notified to their employers, so that any potential patterns of inappropriate behaviour

¹ (Miller & Rollnick, 1991).

² For example, "I am sure you subscribe to Loddon's values, so help me understand how you came to behave in a way which is not in keeping with those, so that we can understand what actions or support you might need so that we can both be confident that it will not happen again."



can be identified. The school's response to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern i.e., whether they are an employee, or worker to whom the disciplinary procedure would apply; or a contractor or visitor who may be subject to alternative procedures. The Loddon School's response will need to be tailored accordingly so it may be necessary to seek legal advice. Where low-level concerns relate to agency staff, and there is therefore an inability to formally address a concern through the school disciplinary procedures, consideration will be given to whether to continue to use that member of staff.

- g) Some concerns may trigger The Loddon School's disciplinary, grievance or whistleblowing procedures, these should be followed where appropriate. Where low-level concerns are raised which in fact require other internal processes to be followed, it can be difficult to determine how best to investigate the concern and which procedure to follow. The Loddon School professionals will exercise their judgement and, if in any doubt, seek advice from external agencies or professionals most likely including the LADO.
- h) If the HR team advise that the disciplinary procedure is triggered, The Loddon School will ensure the individual has an opportunity to respond to any factual allegations which form the basis of a disciplinary case against them. This would be of particular importance in the case of disciplinary action against a member of staff for cumulative alleged 'breaches' of the staff code of conduct, including low level concerns.

8. Low Level Concern Reporting

Staff should share low level concerns through the online Raise a Safeguarding Concern form accessed via The Loddon School 'Hub'. This can be accessed here:

https://forms.office.com/Pages/ResponsePage.aspx?id=MjtSI4Az7kutizfoporCGRRjIXplcgxGv9_EfqaMJfhUQThVQ1VVQzIOUFI0S0U4RVg3SzZBRVNTMCQIQCN0PWcu

9. Key Reference Document

More information about low level concerns can be found in this document, referenced in KCSIE 2025:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

Document changes table

Date	Summary of Changes	Name	Date of next review
6 th April 2022	Removed references to 'sleep-ins'. Changed a factual inaccuracy: now three CSM-based DDSLs, instead of two.	Tim Clark	Sept 2022
27 th August 2022	Added detail about how LLC are reviewed	Tim Clark	Sept 2022



Approved by: TRU

Owned by: SAF

THE LODDON FOUNDATION LTD

Safeguarding and Child Protection

25 th September 2022	Removed Marion Cornick as responsible individual. Added Gill Barrett (Awaiting approval to Responsible individual). Changed all references to the current version of KCSIE 2021 to 2022. Changed the order of reporting to Home Authority before reporting to LADO. Changed peer-on-peer abuse to child-on-child abuse. Amended Low Level Concern information.	Kelly Simpson & Tim Clark	Sept 2023
23 rd November 2022	Added clarity that this policy also refers to agency staff. Added clarity to staff's 'corresponding vulnerability' and the actions they must take in maintaining an 'open working approach'. Highlighted the importance of adhering to other policies because of their impact on safeguarding the children.	Tim Clark	September 2023
6 th September 2023	Full review. Changes included: Updated ref. to 2023 KCSIE instead of 2022 Updated all KCSIE quotes. Added new content in relation to internet filtering and monitoring.	Tim Clark	September 2024
5 th October 2024	<i>Review conducted in accordance with KCSIE 2024 using the HSCP Model policies for reference.</i> Add a linked contents table Added references to Pam Dobson & Laura Lovett being DDSL Updated all quoted text from KCSIE to the 2024 text. Added Responsible Individual responsibilities section. Added the strengthened need to have signed copies of initial concern records. Added the strengthened need to have records of the rationale for decisions – including where decisions are made to not refer externally. Defined terminology used: references to young adults accommodated at Loddon falling within the policy. Added explanation for preference of speaking with LADO prior to speaking to parents.	Kelly Simpson & Tim Clark	September 2025
4 th July 2025	<i>** In the case of a concern related to a young person accommodated at TLS who is 18 years or above Hampshire Adult Safeguarding Services will be informed as well as Hampshire Child Protection Services.</i> Added information on the children's guide to the introduction. Added Policy Lead	Kelly Simpson & Tim Clark	September 2025



Approved by: TRU

Owned by: SAF

THE LODDON FOUNDATION LTD

Safeguarding and Child Protection

21 st October 2025	<p>Updated all ref. to 2025 KCSIE instead of 2024.</p> <p>Updated content based on changes between '24 & '25 KCSIE:</p> <ul style="list-style-type: none">• Added the "4Cs" of online safety.• Strengthen the language around the regular review and effectiveness of filtering and monitoring systems.• Added reference to generative AI. <p>Clarified that LLCs that had been formalised into more significant concerns would not be excluded from employment references.</p> <p>Clarified that visitors' supervision is contingent on the DBS status.</p> <p>Readded the NSPCC Whistleblowing Advice Line phone number to the Staff Instructions poster.</p> <p>Updated the list of Annex B types of abuse.</p> <p>Updated the list of Key legislation and guidance. Added several references to legislation and guidance throughout doc.</p>	Laura Lovett & Tim Clark	September 2026
-------------------------------	--	--------------------------	----------------