

## Record Keeping and Designated Safeguarding Lead (DSL) Procedures Policy

*(Including CPOMS and Notifiable Occurrence / Serious Incident Procedures)*

### 1. Purpose

This policy sets out how safeguarding and child protection concerns are:

- Recorded, stored, accessed, shared and transferred
- Managed and reviewed by the Designated Safeguarding Lead (DSL)
- Logged and monitored using CPOMS
- Responded to where a Notifiable Occurrence or Serious Incident arises

It ensures safeguarding records are consistent, accurate, secure and child-centred, and that statutory safeguarding responsibilities are met.

### 2. Scope

This policy applies to:

- All staff, volunteers, agency staff and contractors
- All learners under 18 and vulnerable adults
- All safeguarding, child protection, welfare, early help and low-level concern records

Safeguarding record keeping is the responsibility of **all staff**, with strategic and operational oversight held by the DSL.

### 3. Core Principles of Safeguarding Record Keeping

Safeguarding records must be:

- **Accurate** – factual, balanced and objective
- **Timely** – recorded as soon as possible
- **Clear and professional** – free from jargon, speculation or investigation
- **Child-centred** – focused on lived experience and impact
- **Secure and confidential** – accessed only on a need-to-know basis

Safeguarding records must never be deleted, backdated or altered to obscure original content.

### 4. Safeguarding Recording System – CPOMS

#### 4.1 Use of CPOMS

The organisation uses **CPOMS** as its central safeguarding and wellbeing recording system. All safeguarding concerns, disclosures, welfare concerns with a safeguarding element, actions and decisions must be recorded on CPOMS.

CPOMS provides:

- Secure, role-based access
- Chronological safeguarding histories
- Audit trails for decision-making and actions

#### 4.2 What Must Be Recorded on CPOMS

Staff must record:

- Disclosures made by learners
- Observations or concerns about welfare or safety
- Physical injuries or marks (with body maps where appropriate)
- Child-on-child safeguarding concerns
- Online safety concerns
- Mental health and wellbeing concerns where safeguarding barriers exist
- Low-level concerns about adults
- Safeguarding-related communication with parents/carers
- Referrals to external agencies and outcomes

Any handwritten notes must be passed to the DSL for upload and then securely destroyed.

#### 4.3 Standard of CPOMS Entries

CPOMS entries must:

- Be factual and objective
- Use the learner's own words where possible
- Include date, time, location and names
- Avoid assumptions, diagnosis or investigation
- Clearly separate fact from opinion

Staff must not promise confidentiality to learners.

#### 4.4 Access and Permissions

- All staff: ability to log concerns
- DSL and Deputy DSLs: full safeguarding access
- Access is role-based, logged and routinely reviewed
- Safeguarding records are stored separately from academic or routine behavioural records

### 5. Safeguarding Recording Timeframes

- All concerns must be logged on CPOMS **on the same working day**
- Urgent or high-risk concerns must be verbally reported to the DSL **immediately**
- The DSL or Deputy DSL reviews new CPOMS entries **within 24 hours**

- Actions and decisions are recorded **as soon as they are made**
- Where no immediate action is taken, the rationale must be recorded

Delays in recording or escalation may be addressed through training or supervision.

## 6. Roles and Responsibilities

### 6.1 Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- Reviewing and triaging all safeguarding concerns
- Determining thresholds and appropriate responses
- Making referrals to external agencies where required
- Maintaining accurate safeguarding files and chronologies
- Monitoring patterns, themes and emerging risks
- Overseeing CPOMS access, quality and compliance
- Ensuring secure transfer of safeguarding records
- Providing advice, supervision and support to staff
- Ensuring safeguarding training is delivered and refreshed

### 6.2 Deputy DSL(s)

Deputy DSLs:

- Act in the DSL's absence
- Support record reviews, decision-making and referrals
- Maintain equivalent standards of confidentiality and safeguarding practice

### 6.3 All Staff

All staff must:

- Remain vigilant and professionally curious
- Record concerns accurately and promptly on CPOMS
- Escalate urgent concerns immediately
- Follow safeguarding training and this policy

## 7. Safeguarding Thresholds and Decision-Making

Safeguarding concerns are assessed using professional judgement and may fall into the following broad categories:

- **Monitoring / Record-Only** – isolated or emerging concerns requiring oversight
- **Early Help / Targeted Support** – coordinated support without statutory intervention
- **Child in Need** – concerns impacting health or development
- **Child Protection / Immediate Risk** – significant harm or immediate danger

Threshold decisions, actions taken and reasons for escalation or non-escalation must be clearly recorded.

## **8. Child Protection Files**

A child protection file is created when:

- Concerns escalate beyond routine pastoral support
- A referral is made to Children's Social Care
- There is sustained or multi-agency involvement

Files may include:

- CPOMS records and linked concerns
- Chronologies
- Referral documentation
- Strategy or review meeting notes
- Professional correspondence and reports

Files are retained securely and not destroyed while concerns remain active or relevant.

## **9. Safeguarding Chronologies**

The DSL is responsible for maintaining and reviewing safeguarding chronologies where concerns are ongoing or complex.

Chronologies:

- Capture cumulative harm and emerging patterns
- Support escalation and referral decision-making
- Are reviewed regularly and prior to referrals

## **10. Learners with SEND or Communication Needs**

For learners with SEND or communication differences:

- Behaviour is recognised as possible communication of distress
- Staff record observable changes in behaviour, mood or regulation
- Specialist staff or key workers may contribute to safeguarding records
- Decisions consider increased vulnerability and barriers to disclosure

## **11. Use of Body Maps**

Where physical marks or injuries are observed:

- Body maps may support factual recording
- They must include date, time, observer name and context

- They must not provide medical opinion or diagnosis
- They must be uploaded to CPOMS and reviewed promptly by the DSL
- Photographs are not taken unless explicitly authorised

## **12. Low-Level Concerns About Adults**

Low-level concerns relate to conduct inconsistent with professional standards.

Procedures:

- All concerns are recorded on CPOMS
- Reviewed by the DSL or senior leader
- Patterns and repetition are monitored
- Cumulative concerns are formally reviewed
- Access is restricted and records retained securely

## **13. Allegations Against Staff and LADO Interface**

Where a concern suggests an adult may pose a risk to learners:

- No internal investigation occurs before consultation
- Advice is sought from the relevant external authority
- Proportionate safeguarding measures are implemented
- All actions and decisions are recorded securely

Suspension is not an automatic outcome and decisions are risk-based.

## **14. Information Sharing**

Safeguarding information is shared:

- On a need-to-know basis
- Lawfully and proportionately
- Without consent where there is risk of harm

Decisions to share or withhold information, including rationale, are recorded on CPOMS.

## **15. Transfer of Safeguarding Records**

When a learner moves setting:

- Safeguarding records are transferred securely and directly to the receiving DSL
- Transfer occurs as soon as possible
- Confirmation of receipt is requested and logged
- Records are not given to learners or parents/carers

## **16. Notifiable Occurrence / Serious Incident Procedures (NOC / SIN)**

## **16.1 Definition**

A notifiable or serious incident includes:

- A child death or serious harm where abuse or neglect is suspected
- The death of a looked-after child
- A serious safeguarding failure

## **16.2 DSL Response**

The DSL will:

1. Ensure immediate safety and medical support
2. Inform senior leadership
3. Contact appropriate external agencies
4. Ensure clear and comprehensive records are maintained
5. Cooperate fully with statutory and regulatory processes

The DSL does not investigate but ensures appropriate escalation and safeguarding measures.

## **17. Record Accuracy, Amendments and Professional Disagreement**

- Records must not be deleted
- Corrections must be dated and clearly identified
- Professional disagreement may be recorded respectfully and factually

## **18. Confidentiality Expectations**

Staff must:

- Not keep personal copies of safeguarding notes
- Not discuss safeguarding matters in informal spaces
- Not download, print or share records outside authorised processes

Breaches may result in disciplinary action.

## **19. Storage, Retention and Security**

- Safeguarding records are stored securely within CPOMS
- Access is logged and regularly reviewed
- Retention follows statutory and local safeguarding guidance
- Archived records remain protected

## **20. Training, Monitoring and Review**

- CPOMS training is completed before system access

- Safeguarding training occurs at induction and regularly thereafter
- The DSL audits safeguarding records routinely
- This policy is reviewed annually or following significant safeguarding events

## 21. Related Policies

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Low-Level Concerns Policy
- Online Safety Policy
- Behaviour Policy
- Data Protection Policy
- Whistleblowing Policy

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