



Safeguarding and Child Protection Policy September 2025

If you believe a child to be at immediate risk of harm,
contact the Police on 999 without delay.

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1. Foundation contacts

Foundation Chair of Governors:	Pat Preston
Safeguarding Governors:	Sue Hincks and Adrienne Plunkett
Head of Foundation:	Ben Charles

Designated Safeguarding Lead (DSL) and Child Sexual Exploitation (CSE) Lead:

For the Senior School	Harriet Dyke (Deputy Head Pastoral)
For King's St Alban's	Nick Hawker (Head)
For King's Hawford	Tom Butt (Head)
For King's Hawford EYSL)	Emma Lane and Stefanie Danks (Early Years Safeguarding Lead - EYSL)
For King's St Alban's	Briony Cartwright (Early Years Safeguarding Lead - EYSL)

Deputy Designated Safeguarding Lead (DDSL):

For the Senior School	Alice Fellows, Richard Chapman, Rebecca Kent and Katie Quirke
For King's St Alban's	Adam Kent (Deputy Head)
For King's Hawford	Caroline Knight (Assistant Head Pastoral)

Prevent Single Point of Contact (SPOC)/Designated Teacher for Children Looked After:

For the Senior School	Harriet Dyke (Deputy Head Pastoral)
For King's St Alban's	Nick Hawker (Head)
For King's Hawford	Tom Butt (Head)

Foundation Designated Mental Health Lead:

Alice Fellows.

While the staff listed above have specific roles in safeguarding the pupils at King's, all adults have a responsibility to safeguard children. Anyone can make a referral to Children's Services, though the DSL should be informed if a referral is made.

If anyone has any concerns regarding the welfare or safety of a child, they are able to make referral to Children's Services (using the contact details listed below or the correct local authority if a child lives outside of Worcestershire) or, in the event of an emergency, the Police on 999.

In this policy, the term 'staff' includes governors, supply staff, agency staff and volunteers.

2. External contacts

Worcestershire Children's Services – Family Front Door

- Telephone: 01905 822666
- Out of hours Emergency Duty Team telephone: 01905 768020
- Email: childrensteam@worcestershire.gov.uk

The School's information management system indicates if a child lives outside of Worcestershire in the event that another Local Authority, Children's Services or Police needs to be contacted.

Police

- 24hrs non-emergency telephone: 101
- Emergency telephone: 999

LADO – Local Authority Designated Officer

- Telephone: 01905 846 221
- Email: LADO@worcschildrenfirst.org.uk

NSPCC

- Helpline telephone: 0808 800 5000
- Whistleblowing Advice Line telephone: 0800 028 0285
- Report Abuse in Education telephone: 0800 136 663
- Email: help@nspcc.org.uk

Prevent

- Telephone: 01386 591835
- Email: prevent@westmercia.pnn.police.uk

Independent Schools Inspectorate

- Telephone: 0207 6000 100
- Email: concerns@isi.net

OFSTED Safeguarding Children

- Telephone: 0300 123 4666
- Email: CIE@ofsted.gov.uk

Disclosure and Barring Service

- Telephone: 0300 0200 190
- Email: customerservices@dbf.gov.uk

Teaching Regulation Agency

- Telephone: 0207 5935 393
- Email: misconduct.teacher@education.gov.uk

3. Policy statement

The King's School, Worcester ensures that safeguarding is given the highest priority and actively promotes the well-being of pupils. Safeguarding and child protection are at the forefront of, and underpin all relevant aspects of, process and policy development. The Foundation's safeguarding culture supports good practice and enables issues about safeguarding and promoting the welfare of children to be addressed promptly and appropriately in the best interests of the children.

This policy applies to The King's School, Worcester (the Foundation) which includes both King's St Alban's, Kings Hawford, and the EYFS settings at King's St Alban's and King's Hawford. This policy is reviewed and updated annually (as a minimum) and is available on the Foundation website.

4. References

This policy has regard to the following guidance and advice:

- [Keeping Children Safe in Education \(July 2025, with final version due September 2025\) \("KCSIE"\)](#)
- [Working Together to Safeguard Children \(March 2026\)](#)
- [Information sharing: advice for practitioners providing safeguarding services \(May 2024\)](#)
- [Prevent Duty Guidance for England and Wales \(December 2023\)](#)
- [The Prevent Duty: an introduction for those with safeguarding responsibilities \(September 2023\)](#)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Relationships education, relationships and sex education \(RSE\) and health education \(September 2021, and new guidance for implementation from September 2026\)](#)
- [Children's Social Care National Framework \(February 2024\)](#)
- [Behaviour in Schools \(February 2024\)](#)
- [Working together to improve school attendance \(August 2024\)](#)
- [Digital and technology standards in schools and colleges \(May 2024\)](#)
- [After School clubs, community activities, and tuition \(safeguarding guidance for providers \(September 2023\)](#)
- [The Charity Commission guidance: Safeguarding and protecting people for charities and trustees \(June 2022\)](#)
- [What to do if you're worried a child is being abused: advice for practitioners \(March 2015\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(March 2024\)](#)

At the time of review, we also await the expected revised guidance on gender questioning children, which is due to be in the September 2025 version of KCSIE.

This policy also takes into account the procedures and practice of Worcestershire Local Authority as part of the multi-agency safeguarding arrangements set up by the Worcestershire Safeguarding Children Partnership (WSCP). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the [West Mercia Consortium inter-agency procedures](#) and the [WSCP Levels of Need Guidance](#).

Equality Act 2010: The Foundation understands and recognises its obligations under the Equality Act and that the Foundation must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the Foundation will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The Foundation will also consider their duty to make reasonable adjustments for disabled pupils.

5. Links to other Foundation policies

This policy should be read in conjunction with the following Foundation Policies:

- Anti-Bullying
- Attendance
- Behaviour Management
- First Aid
- Low Level Concerns
- RSE
- Supervision
- Support Families Statement
- Staff Code of Conduct
- Medical
- Mental Health and Well-being Charter
- Missing Child
- PSHE
- Pupil Acceptable Use
- Use of Drugs and Alcohol
- Whistleblowing
- Supporting Families Statement

6. Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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.

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its

effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation and domestic abuse.

7. Dealing with concerns about a child

The Foundation has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children are everyone's responsibility. The Foundation adopts a 'whole school' approach to safeguarding. This means involving everyone in the Foundation and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents and guardians are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children.

Staff who suspect or hear an allegation or complaint of abuse, neglect or exploitation from a child or any third party, must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

Whilst receiving a disclosure, all staff should:

- listen carefully
- avoid asking leading questions
- observe the child's behaviour
- reassure the individual that the matter will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, neglected or exploited, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL/DDSL if they have concerns

- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. This should be given to the DSL for them to store securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or DDSL).

8. Information sharing

Early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

The guidance [Information sharing: advice for practitioners providing safeguarding services \(May 2024\)](#) supports staff who have to make decisions about sharing information.

This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR).

DPA and UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or DDSL. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

The Foundation recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Relevant data protection principles allow for the sharing (and withholding) of personal information.

Information that is stored and shared for safeguarding purposes, including information which is sensitive and personal, should be treated as 'special category personal data'. 'Safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where:

- it is not possible to gain consent
- it cannot be reasonably expected to gain consent
- gaining consent would place a child at risk.

The School will not provide pupils' personal data where the serious harm test is met. This means that information would be withheld if access to that information would be likely to cause serious harm to the physical or mental health of an individual.

9. Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the Foundation and can occur between children, and between children and adults, outside school. All staff, but especially the DSLs and DDSs, should consider the context within which such incidents and/or behaviours occur. The Foundation will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The Foundation will share as much information with children's social care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse. The Foundation has prepared a safeguarding risk assessment which is under constant review, which includes contextual factors such as site security.

10. Voice of the child

Pupil voice is important at King's, and the Foundation implements a child-centred approach to safeguarding. As far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

The Foundation has arrangements for listening to children and providing early help. For example, pupils are able to speak to their Pastoral Team at any time, and raise complaints or concerns via our reporting routes, including the online platform Student Voice for Senior School pupils, or worry boxes for Junior School pupils.

Where there is a safeguarding concern, the Foundation will ensure the pupil's wishes and feelings are listened to when determining what action to take and what services to provide. There will be situations where, whilst the pupil's views will be listened to, the Foundation has no alternative but to take action, i.e. where there is risk to a child, abuse, neglect or exploitation is suspected or where a crime has possibly been committed or there is a risk of a crime being committed. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The Foundation manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Pupil voice at a cohort level is also helpful to understand and respond to the experiences of children. This is done in an age-appropriate way, for example via pastoral sessions, school council and pupil surveys.

11. Early help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or guardian in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL/DDSL. The DSL/DDSL will consider the appropriate action to take in accordance with the WSCP referral threshold document. The DSL/DDSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Details of the Foundation's Early Help provision can be found in the Foundation's Support for Families Statement on the policies' page of the [Foundation's website](#).

12. What staff should do if they have concerns about a child, or if a child is in danger or at risk of harm

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL /DDSL to agree a course of action, although staff can make a direct referral to children's social care.

As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If it is believed that a child is in immediate danger or at risk of harm, staff should make an

immediate referral to children's social care and/or the Police. Any such referral must be made immediately and within 24 hours (one working day) of staff being aware of the risk.

Parental consent is not needed for referrals to statutory agencies such as the Police and children's social care. If anyone other than the DSL/DDSL makes a referral, they should inform the DSL/DDSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL/DDSL should communicate children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL/DDSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

13. What staff should do if a child is seen as at risk of radicalisation

Staff should follow the Foundation's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care.

14. What staff should do if they discover an act of Female Genital Mutilation (FGM)

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL/DDSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

15. What staff should do if they have concerns that children are at risk from serious violent crime

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include unexplainable and/or persistent absences from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL/DDSL to agree a course of action, although staff can make a direct referral to children's social care.

16. How staff should respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes. Staff must not ask to see or be sent any images or attempt to search a device.

For this purpose, 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL/DDSL will follow the guidance ["Sharing nudes and semi-nudes: advice for education settings working with children and young people" \(March 2024\)](#) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- carrying out interviews with the children involved (if appropriate)
- informing parents and guardians at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed
- carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- if not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the Foundation's Safeguarding and Child Protection and Behaviour Management policies
- if it is determined that there is a risk of harm, the DSL/DDSL must make a referral to children's social care and/or the Police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head of Foundation. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL/DDSL immediately, who should always inform the Police as a matter of urgency.

17. What staff should do if a child is absent from education

Children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues. It is important that the Foundation's response to unexplainable and/or persistent absences from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The Foundation's procedures for unauthorised absence and for dealing with children who go missing from education can be found in the Attendance Policy and Missing Child Policy which are to be used for searching for, and if necessary, reporting, any pupil missing from education.

Where reasonably possible, the Foundation will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The Foundation will report to Worcestershire Children First when a pupil fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more. More detail can be found the [Worcestershire Education Engagement Team \(Attendance and Children Missing Education\)](#).

The School will inform the local authority of any pupil who is going to be added to or deleted from the Foundation's admission register at non-standard transition points. This will assist the local authority to:

- fulfil its duty to identify children of compulsory school age who are missing from education; and
- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or exploitation.

When working with local authority where school absence indicates safeguarding concerns the School will have regard to the DfE guidance '[Working together to improve school attendance \(August 2024\)](#)'.

Alternative Provision: where a school places a pupil with an alternative provision provider, (such as the Medical Education Team) it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

Schools should always know where a child is based during school hours and should regularly review the alternative provision placements they make. This is to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.

18. What staff should do if a child needs a social worker (Children in Need and Child Protection)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL/DDSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children in Need (CIN): These are children who have been assessed as being children in need as defined under Section 17 of Children Act 1989. They will have a multi-agency CIN plan, led by the local authority social worker. The Foundation should be informed of the CIN plan and of the name of the social worker. The plan should be reviewed.

Child Protection (CP): These are children where a decision has been taken at a multi-agency Child Protection Conference that they are at risk of significant harm and require a Child Protection Plan. Core Groups will be held to ensure the plan is progressed and Review Child Protection Conferences, after three months and then six monthly, to consider the effectiveness of the plan. The School will be invited to attend the conferences and to provide a report, and to be a member of the Core Groups.

19. What staff should do if a child requires mental health support

The Foundation has an important role to play in supporting the mental health and well-being of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The Foundation aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional well-being of our pupils. Staff should contact the DSL/DDSL if they are concerned about a pupil.

Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. The Foundation has a Mental Health and Well-being Charter and a Designated Mental Health Lead. All members of the Foundation – including staff, pupils, parents and guardians – have access to The Wellbeing Hub, an online platform with a wide range of resources relating to mental health and well-being.

20. What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about **another staff member** (including supply staff, agency staff, volunteers and contractors), then this should be referred to the **Head of Foundation**.

If staff have safeguarding concerns about the **Head of Foundation**, then this should be referred to the **Chair of Governors**.

21. What staff should do if they have concerns about safeguarding practices in the School

The Foundation aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the Foundation's safeguarding systems, these should be raised in accordance with the Foundation's whistleblowing procedures which can be found in the Whistleblowing policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the External Contacts page at the start of this policy.

22. Arrangements for dealing with child-on-child allegations

Child-on-child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issue, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The Foundation takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The Foundation acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the Schools, such abuse may still be taking place and is simply not being reported. The Foundation will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the Schools will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children, for example through a pupil's pastoral team, worry boxes, and the Student Voice reporting

platform.

The Foundation recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The Foundation also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the Foundation's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The Foundation recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the child when they raise a concern.

The Foundation recognises that children with Special Educational Needs and Disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The Foundation will implement extra pastoral support for those children and offer counselling where appropriate. The Foundation also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. Girls are more likely to be victims of sexual violence and harassment, as are children with SEND.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the Foundation's Anti-Bullying and Behaviour Management policies:

- the Foundation will take advice from the Family Front Door on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim(s) and perpetrator(s)
- if it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the Foundation will facilitate that, subject to the advice of the Family Front Door
- a pupil against whom an allegation of abuse has been made may be suspended from the Foundation during the investigation
- parents/guardians are informed as soon as possible
- pupils involved are supported during the interview by an appropriate adult and until the investigation is completed
- confidentiality will be an important consideration for the Foundation and advice will be sought as necessary from the Family Front Door and/or the Police as appropriate
- the Foundation will have regard to the procedures set out in KCSIE at all times.

The victim may ask the Schools not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider:

- parents or guardians should normally be informed unless doing so would put the victim at greater risk
- the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. Where a report has been made to the Police, the Foundation will consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or guardians.

If the DSL/DDSL decides to make a referral to children's social care and/or a report to the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL/DDSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the WSCP referral process.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Pupils will be supported by pastoral staff and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL/DDSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim
- whether there may have been other victims
- the alleged perpetrator(s) and
- all the other children (and, if appropriate, staff) at the Foundation especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review.

In relation to a report of sexual violence or sexual harassment, the DSL/DDSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The Foundation will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The Foundation will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The Foundation acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged

perpetrator(s).

The DSL/DDSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises (including during any before or after school-based activities), and school transport. The Foundation will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The Foundation will keep a written record of all concerns, discussions and decisions made.

The Foundation will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Foundation's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the Foundation will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL/DDSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head of Foundation will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the Foundation's Behaviour Management policy.

23. Dealing with safeguarding concerns or allegations of abuse about staff, volunteers and contractors

The Foundation's procedures for managing allegations against staff, volunteers and contractors who are currently working in the Foundation, whether in a paid or unpaid capacity, applies when they have (or are alleged to have):

- Behaved in a way that has harmed a pupil, 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 indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harms test should be dealt with using the Foundation's Low Level Concerns policy and related procedures set out below.

If an allegation is made against anyone working with children in the Foundation, before contacting the LADO, the Foundation may conduct a basic enquiry in line with local procedures to establish the facts

in order to determine whether there appears to be any credibility to the allegation. The Foundation should not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the Foundation may discuss with the LADO on a no-names basis.

When dealing with allegations about a staff member the Foundation will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will provide support for the person subject to the allegation.

- Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head of Foundation.
- Where the Head of Foundation is absent, or the subject of the allegation, the Chair of Governors will be the case manager. The Chair of Governors contact details can be obtained from the Clerk to the Governors, clerk@ksw.org.uk.
- If an allegation is reported to the DSL/DDSL, the DSL/DDSL will keep the Head of Foundation informed.
- Where the Head of Foundation is the subject of the allegation or concern, the Head of Foundation must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL /DDSL and make any referral via them.
- The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police.
- Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and, as appropriate, the Police immediately.
- All discussions should be recorded in writing, and any communication with both the individual and the parents/guardians of the child(ren) agreed.
- The LADO should be informed within one working day of all allegations that come to the Foundation's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care. The DSL/DDSL is responsible for ensuring the child is not at risk.
- Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
- When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the Police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the Foundation or whether alternative

arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- redeployment within the Foundation so that the individual does not have direct contact with the child or children concerned; and / or
- providing an assistant to be present when the individual has contact with children; and / or
- redeploying to alternative work in the Foundation so the individual does not have unsupervised access to children; and / or
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents/guardians have been consulted; and / or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension. This will, however, depend upon the nature of the allegation.

- Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the Foundation is/are at risk of harm, or the allegation is so serious that it might be grounds for dismissal. The case manager will take appropriate professional advice and will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension (including with respect to considering alternatives).
- Where the individual is suspended, the case manager will confirm the decision within one working day of a decision to suspend, and will ensure they know who their point of contact is in the Foundation and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.
- Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the Foundation to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the Foundation. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
- The case manager will ensure that parents/guardians are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Parents/guardians and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
- The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient

evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

- Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial decision to suspend and subsequent review dates will be set at the review meeting.
- The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the Foundation ceases to use their services, or the person resigns or otherwise ceases to provide their services. The Foundation has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the Foundation must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the Foundation's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

The Foundation has a duty of care to its staff, and whilst the welfare of a child is paramount, the Foundation must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The Foundation will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents/guardians who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL/DDSL

should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head of Foundation will consider whether any disciplinary action is appropriate against a pupil or member of staff who made it in accordance with the Foundation's Behaviour Management policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the Foundation will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Non-recent allegations

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse relating to an individual believed to be still teaching or working with children should be referred to the Police and also the LADO.

24. Dealing with safeguarding concerns or allegations of abuse about supply teachers, contracted staff and external organisations or individuals using school premises

The Foundation's procedures for managing allegations against staff above also apply to staff not directly employed by the Foundation, for example, supply teachers provided by an employment agency or business ('the agency'). The Foundation will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, Police and/or children's social care.

In no circumstances will the Foundation decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The Foundation will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the Foundation, whilst they carry out their investigation.

The Foundation will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the Foundation during the investigation.

When using an agency, the Foundation should inform the agency of its process for managing allegations. This should include inviting the agency's Human Resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the Foundation must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

The Foundation may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the Foundation's premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the Foundation will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the Foundation's site are provided under the direct supervision or management of Foundation staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the Foundation, the Foundation will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (as per Keeping Children Safe in Out of School Settings) and the Foundation will inspect these as needed; and ensure that there are arrangements in place for the provider to liaise with the Foundation on these matters where appropriate.

As part of carrying out this duty, the Foundation is likely to be processing personal data about individuals with whom the School has no relationship but the duty to inform the LADO set out in KCSIE overrides this. When staff premises or facilities are rented out, safeguarding requirements are included in the transfer of control agreement. The duty to inform the LADO – and any other relevant agency – is clearly referenced in any written agreement.

25. Arrangements for dealing with low level concerns or allegations

A low-level concern is any concern that an adult working in or on behalf of the Foundation 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a nagging doubt. 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 (for example, grooming-type behaviours).

The Foundation takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the Foundation's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The aim of the Foundation's Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this Code of Conduct at all times.

Staff must share all concerns with the Head of Foundation without delay so that they can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level

concern is raised about the Head of Foundation, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

Further details can be found in the Low-Level Concerns Policy. The Head of Foundation is the ultimate decision-maker in respect of all low-level concerns.

26. Safer recruitment

The Foundation is committed to safer recruitment processes. Members of the teaching and support staff at the Foundation including part-time staff, temporary and supply staff, and visiting staff are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate.

A DBS certificate will be obtained from the candidate before they start employment or as soon as practicable after they commence employment with a satisfactory risk assessment in place. Where an individual starts work in regulated activity relating to children before the DBS is available, the Foundation will put in place a risk assessment to ensure that the individual is appropriately supervised. All other checks will be carried out, including a separate children's barred list check. Alternatively, if the applicant has subscribed to it and gives permission, the Foundation may undertake an online update check through the DBS Update Service.

Adults, who are not Foundation employees, living in school accommodation where a regulated activity takes place will also be subject to DBS checks.

Full details of the Foundation's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the Foundation's Recruitment and Selection Policy.

The Foundation's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the Foundation's Visiting Speaker Protocol.

The Foundation's procedures for managing contractors attending the school sites can be found in the Code of Conduct for Contractors.

27. Management of safeguarding

The Foundation's DSLs are members of their School's Foundation Leadership Team.

If the relevant DSL is absent the DDSL is the person to whom reports should be made. This ensures there is the required cover for the role at all times.

The DSLs and DDSLs names can be found on the Key Contacts page at the start of this policy.

The DSLs' role is to take lead responsibility for safeguarding and child protection matters in the Foundation. The DSLs' responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the Police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSLs will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place.

The Foundation's DSLs meet with the Governors to review and update the Foundation's Safeguarding policy.

Where a pupil leaves the Foundation, including for in-year transfers, the relevant DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the Foundation's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL or a DDSL will always be available during school hours for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted by mobile. For out of hours/out of term activities, staff are made aware of the contact details for the DSL/DDSL.

The DSL or DDSL should liaise with the three safeguarding partners (Worcestershire County Council, the Police and NHS) and work with other agencies in line with *WT*.

The DSLs are responsible for liaising with the Designated Mental Health Lead where safeguarding concerns are linked to mental health. The DSL or DDSL should be confident as to what local specialist support is available to children and be confident as to how to access this support when required.

The governing body has a strategic leadership responsibility for the Foundation's Safeguarding arrangements and ensures that it complies with its legislative duties. The governing body has regard to KCSIE and ensures policies, procedures and training in the Foundation are effective and comply with the law at all times. The Head of Foundation and the other Heads within the Foundation ensure that the policies and procedures, adopted by the governing body (particularly those concerning referrals of cases of suspected abuse, neglect and exploitation), are understood, and followed by all staff.

Full details of the DSL role can be found at Annex C of *KCSIE*.

28. Training

All staff, including Governors, need induction and training to understand their responsibilities.

All Staff

All new staff will be provided with induction training that includes:

- the Safeguarding and Child Protection policy (including the policy and procedures to deal with child on child abuse)
- the role and identity of the DSL and the DDSLs
- the Behaviour Management policy and Anti-Bullying policy
- the Staff Code of Conduct including the Foundation's Whistleblowing procedure and the Acceptable Use Policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education
- an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

All staff are also required to:

- read at least Part one of *KCSIE* (or, for staff who do not work directly with children, Annex A) and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via staff briefings/safeguarding updates
- understand key information contained in Part one (or, for staff who do not work directly with children, Annex A) of *KCSIE*. The Foundation will ensure staff understanding by including this in whole school training
- receive training in safeguarding and child protection regularly
- undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the Foundation are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

DSLs and DDSLs

The DSLs and DDSLs receive updated safeguarding and child protection training at least every two years to provide them with the knowledge and skills required to carry out the role and has lead responsibility. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the WSCP approach to Prevent duties and harmful sexual behaviours. Prevent Single points of contact have enhanced training to equip the to execute this role. Further details of the required training content for the DSLs and DDSLs are set out in

Annex C of *KCSIE*.

In addition to their formal training, the DSLs and DDSLs' knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the Foundation will support the DSLs and DDSLs in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSLs. The Foundation Safeguarding Team meets once a term, bringing together the DSLs and DDSLs across the Foundation to discuss patterns and trends, case studies, training and updating safeguarding practices Foundation-wide.

29. Oversight of safeguarding, including arrangements for reviewing policies and procedures

Adrienne Plunkett and Sue Hincks are the board-level leads designated to take a lead in relation to responsibility for the safeguarding arrangements in the Foundation. They are both members of the governing body. The Governors' Compliance committee has an overview of safeguarding and a termly report is made to the governing body.

The Foundation considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the Foundation's Safeguarding and Child Protection policy takes place at least annually, including an update and review of the effectiveness of procedures, and their implementation including lessons learnt from incidents. There are termly meetings with the DSLs and the board-level leads. Termly information is provided to the Governing Body and a fuller Annual Report prepared by the DSLs and Safeguarding Governors is presented, outlining the key issues in safeguarding, the areas of strength and those for development. The Foundation draws on the expertise of staff, including the DSLs and DDSLs, in shaping the Foundation's safeguarding arrangements and policies. If there has been a substantiated allegation against a member of staff, the Foundation will work with the LADO to determine whether there are any improvements to be made to the Foundation's procedures or practice to help prevent similar events in the future.

30. The Foundation's arrangements to fulfil other safeguarding responsibilities

Teaching children how to keep safe

The governing body ensures that all pupils are taught about matters relating to safeguarding, including online safety, through the PSHE and RSE curriculum and pastoral messages. This helps children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and adults. The Foundation recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed. The most vulnerable children will be at greater risk both offline and online. The School's systems can only protect pupils whilst they are in school and further consideration

to these risks and their control measures are included in the Foundation Safeguarding Risk Assessment.

Internet safety (including when children are online at home) is an integral part of the Foundation's ICT curriculum and also embedded in PSHE and RSE schemes of work. The DSLs have lead responsibility for online safety; there is an annual review of the effectiveness of filtering and monitoring done by the DSLs and the Digital Lead Governor.

The Foundation has appropriate filters (LIGHTSPEED) and monitoring systems (SENSO) in place to safeguard children from potentially harmful and inappropriate material online when using the Foundation's IT system. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The Foundation recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The Foundation ensures compliance with the DfE's 'filtering and monitoring standards for schools' by:

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems to protect pupils using the School's IT System
- reviewing the filtering and monitoring provision at least annually
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning
- having effective monitoring strategies in place that meet our safeguarding needs, training staff about their roles and responsibilities and refreshing this training.

Further detail of the Foundation's approach to online safety can be found in the PSHE Policies. Pupils in the Junior Schools are not allowed phones. Pupils in the Senior School in Lower Fourth and Upper Fourth are not allowed to use phones during the school day and those in Lower Remove to Fifth Form are only allowed to use phones with the permission of staff. The Foundation's IT arrangements ensure that children are safe from terrorist and extremist material when accessing the internet through the Foundation's systems. These systems will be reviewed periodically.

The Foundation will liaise with parents and guardians to reinforce the importance of children being safe online and the systems the Foundation uses to filter and monitor online use. Parents and guardians will be made aware of what their children are being asked to do online when undertaking remote learning and homework tasks, including the sites they will be asked to access and who from the Foundation their child is going to be interacting with online.

31. Relationships and Sex Education (RSE)

Relationships Education and/or RSE is compulsory. The Foundation understands that preventative education is most effective in the context of a whole school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment.

The Foundation has regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching Relationships Education and/or RSE.

Relationships Education and/or RSE forms part of the Foundation's PSHE programme. There are standalone RSE policies that can be found on the policies' page of the [Foundation's website](#).

32. Online safety

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying,

and commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The Foundation works to minimise the above areas of risk through, for example, appropriate filtering and monitoring, staff training, online safety education for pupils in PSHE, the Acceptable Use Policies for both staff and pupils and clear guidance on the use of mobile phones and devices.

33. Arrangements for visiting speakers

The Foundation has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The Foundation's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information delivered aligns to the ethos and values of the Foundation and British values.

The Foundation is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the Schools. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.

In some cases, the Schools may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a Foundation employee. Each school shall also keep a record of visiting speakers.

34. Use of mobile phones and cameras

Consideration should always be given to whether the use of photography will place our children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

For this reason, consent is always sought when photographing children and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

35. Looked after children and children in kinship care

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority and any children in kinship care. The Deputy Head Pastoral in the Senior School and the Heads in the Junior Schools are the designated members of staff who have responsibility for their welfare and progress. The Foundation ensures that the designated members of staff receive appropriate training in order to carry out their role.

36. Children with special educational needs, disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

These children may not outwardly show signs of abuse and/or may have difficulties in communicating about abuse, neglect, exploitation or bullying.

These can include:

- assumptions that indicators of possible abuse, neglect or exploitation such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- communication barriers and difficulties in managing or reporting these challenges
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, neglect or exploitation, discussing this with the DSL/DDSL as appropriate.

Any reports of abuse involving children with SEND will therefore require close liaison with the DSL/DDSL and the special educational needs coordinator (SENCO). The Foundation considers extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations such as:

- [NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#) and
- [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

37. Children who are lesbian, gay, bisexual, or gender questioning

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be targeted by other children.

In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents/guardians (other than in the exceptionally rare circumstances where involving parents/guardians would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

38. Early Years provision safeguarding arrangements

Children in Early Years settings have additional vulnerabilities because of their age and ability to communicate.

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the Foundation's early years or provision of care of pupils under the age of eight, the Foundation will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the Foundation's safer recruitment practices, further details of which can be found in the Foundation's Recruitment and Selection Policy. The Foundation records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the Foundation will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the Foundation will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Use of mobile phones and cameras

KSA and KH allow staff to bring in personal mobile telephones and devices for their own use. Users bringing personal devices into school must ensure there is no inappropriate or illegal content on the device. Personal electronic devices including cameras, phones and mobile devices must not be used to photograph or video children. This restriction applies to the entire setting including EYFS (staff, volunteers, governors and pupils).

All staff must ensure that their mobile telephones/devices are left inside their bag or away from view throughout contact time with children. Mobile phone calls may only be taken at staff breaks or in staff members' own time. If staff have a personal emergency, they are free to use the School's phone or make a personal call from their mobile from an appropriate location. If any staff member has a family emergency or similar and is required to keep their mobile phone to hand, the Head of the relevant Prep School should be informed. Staff will need to ensure that the Foundation has up to date contact information and that staff make their families, children's schools and others aware of emergency work telephone numbers. This is the responsibility of the individual staff member. All parent helpers and volunteers will be requested to follow the same rules as a member of staff while on the premises. Staff may use their phones to make essential calls while on school trips. School cameras are available to take photographs of children; personal equipment must not be used.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings are:

For King's Hawford	Emma Lane and Maria Hunt – Early Years Safeguarding Leads (EYSL)
For King's St Alban's	Briony Cartwright – Early Years Safeguarding Lead (EYSL).

The Foundation will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided, for example, where the Foundation is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the Foundation became aware (or ought reasonably to have become aware) of it.

The Foundation will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

39. Review

This policy will be reviewed by the Senior School DSL annually or at a more frequent intervals if there are legislative changes, and/or the evaluation of the policy highlights a need for a review.

Authorised by	Resolution of the Governors
Signature	
Date adopted	29 August 2025
Revised on	20 August 2025
Review due	01 September 2026
Circulation	Members of Governors/ all staff / parents / pupils [on request]

Review notes

August 2025

- Page 3 - Updates to named staff: addition of MH, RK & KQ, removal of KP & SP
- Page 6 - Inclusion of Mental Health and Well-being Charter and Pupil Acceptable Use Policy in list of policies
- Page 28 – monitoring system updated from SECURUS to SENSO
- Page 30 – update Section 35 Looked After Children to include children in kinship care
- Check all links to external pages websites are working, removal of MoJ link that no longer exists. (page 42)
- Updates to bring the policy in line with KCSIE 2025:
 - Page 5 – Reference to new RSE guidance and pending questioning guidance
 - Page 13 - Alternative Provision paragraph, to include additional detail on school's responsibility to regularly review AP for any pupils using this.
 - Page 29 - New section on online safety (section 32) to outline the four Cs risk areas, plus Foundation's actions to minimise these risks (with the updated definition of content risks to include disinformation, misinformation and conspiracy theories)

40. Appendix 1 – Signs and types of abuse

All Foundation staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another; therefore staff should always be vigilant and always raise any concerns with the DSL or DDSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL (and DDSL), should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as ‘extra-familial harm.’ Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm. The School participates fully in Operation Encompass which is the sharing of information between the Police and schools concerning domestic abuse involving children.

All staff should be aware that technology is a significant component in many safeguarding and well-being issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL or DDSL.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or guardian fabricates the symptoms of, or deliberately induces, illness in 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. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing.

Harmful sexual behaviour: is problematic, abusive and violent sexual behaviour that is developmentally inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
- For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)" sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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 occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or guardian 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include unexplainable and/or persistent absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Risks which

increase the likelihood of involvement in serious violence are, for example, being male, frequent absence from school or permanent exclusion from school, experience of child maltreatment or having been involved in offending.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and/or
- children who suffer from sexually transmitted infections; and/or
- children who display sexual behaviours beyond expected sexual development; and/or
- children who become pregnant.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is 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 (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

County lines: is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK – no specified distance of travel is required - as children and vulnerable adults are exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools and online via social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- that have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection

- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Modern slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a School's computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL or DDSL, should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Mental health: all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect or exploitation, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

So called 'honour based' abuse: 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.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Female genital mutilation (FGM): comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. To give an example of indications that a girl has already been subjected to FGM:

- a pupil may have difficulty walking, sitting, or standing and may even look uncomfortable
- a pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating
- there may be unexplainable and/or persistent absence from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return
- a pupil is reluctant to undergo medical examination.

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL/DDSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL/DDSL in accordance with this policy.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

Radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism: is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism: is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL or DDSL making a Prevent referral.

The Prevent duty: All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

Channel: is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. Channel guidance.

Domestic abuse: The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected".

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The Foundation should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the

DSL/DDSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the Local Authority where a child has been harmed or is at risk of harm, in accordance with this policy.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent, guardian or anyone with legal responsibility for the child. Child abduction can be committed by parents, guardians or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents/guardians, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11 year olds](#) and [12-17 year olds](#). The guides explain each step of the process, support and special measures that are available.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent/guardian sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

41. Appendix 2 – Foundation safeguarding poster

