King's Worcester

Safeguarding and Child Protection Policy

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

2026-2027 v2.0
Effective 2nd November 2026

King's Worcester

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1. Foundation Contacts

Foundation Chair of Governors	Pat Preston
Safeguarding Governors	Sue Hincks and Janet Clarke
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 Hawford	Tom Butt (Head)
For King's St Alban's	Nick Hawker (Head)
For King's Hawford	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

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 Foundation'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@dbs.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 open culture of safeguarding is framed around the Foundation's mission to be curious, caring and confident, to support good practice and enable issues about safeguarding and promoting the welfare of children to be addressed promptly and appropriately in the best interests of our pupils and their families.

This policy applies to The King's School, Worcester (the Foundation) which includes both King's St Alban's, King's 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.

In this policy, the term 'staff' includes Governors, supply staff, agency staff, trainee teachers and volunteers.

4. References

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (September 2026)
- Working Together to Safeguard Children (March 2026)
- Early years foundation stage (EYFS) statutory framework (July 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 2026)
- Children's Social Care National Framework (February 2024)
- Behaviour in Schools (February 2024)
- Working together to improve school attendance (July 2026)
- 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)
- Mobile phones in Schools (June 2026)
- Modern slavery: how to identify and support victims (July 2026)
- Generative artificial intelligence (AI) in education (August 2025)

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 Herefordshire and Worcestershire 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 protected characteristics to meet their specific needs and consider the duty to make reasonable adjustments. The Foundation recognises that certain children may have an increased level of vulnerability and / or face additional barriers to reporting an incident of abuse because of their protected characteristics.

The Foundation promotes an inclusive, anti-discriminatory culture in which racism, faith-targeted abuse, discriminatory behaviour and other forms of prejudice-based harm are recognised, challenged and addressed as part of its safeguarding responsibilities.

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
- Medical
- Mental Health and Well-being Charter
- Missing Child
- PSHE – Senior School; PSHE – King's St Alban's; PSHE – King's Hawford
- Pupil Acceptable Use
- RSE – Senior School; RSE – King's St Alban's and King's Hawford
- Supervision
- Support for Families Statement
- Staff Code of Conduct
- Use of Drugs and Alcohol
- Whistleblowing
- Mobile Phones at King's

6. Definitions of Safeguarding and Types of Abuse

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

Parents and guardians are encouraged to raise any concerns directly with the Foundation, 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 procedures below. Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

Disclosures - The Foundation recognises that a child is likely to disclose an allegation to someone they trust and that 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.

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.

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
- 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 appropriate 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 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.

Where the matter 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 external agencies. The Foundation recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the Foundation and with the local authority, the safeguarding partners and other organisations, agencies, and practitioners as required.

The Department for Education guidance *Information sharing: advice for practitioners providing safeguarding services* supports staff who are making 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 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/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.

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 Foundation 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, between children and adults, and outside of school. All staff, but especially the DSLs and DDSLs, 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 insight with Children's Service as possible as part of any referral process to enable consideration of all the available evidence and the full context of any abuse.

All staff 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 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 Foundation has prepared a safeguarding risk assessment which is reviewed annually by the DSL and includes local community and school-specific contextual factors.

10. Voice of the Child

Pupil Voice is important at King's, and the Foundation implements a child-centred approach to safeguarding.

The Foundation has arrangements for listening to children and providing school-based 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 online reporting forms for Senior School pupils via Firefly, or worry boxes for Prep 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, access support 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, pupil focus groups, and pupil surveys.

11. Early Help and Family Help

The Foundation recognises that safeguarding is not limited to child protection concerns. Any child may benefit from support before statutory intervention, including from universal services and community-based **Early Help**, or the targeted early help level of **Family 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.

Family Help is the framework through which local authorities coordinate targeted early intervention and family support. Effective family help relies upon professionals identifying unmet needs for the child

and their family and working with them to identify how best to help and support them. The DSLs and DDSLs will liaise with relevant agencies and make referrals where appropriate to ensure children and families receive support at the right time and at the right level of need, with reference to the *Herefordshire and Worcestershire Levels of Need guidance*. *Working Together to Safeguard Children* provides detailed guidance on the Family Help process.

Further and full details of our Early Help provision can be found in the Foundation's **Support for Families Statement** on the policies' page of the Foundation's website.

12. Vulnerability Factors

All staff should be particularly alert to the potential need for Early Help and Family Help for a child who has additional vulnerabilities, for example a pupil who:

- is disabled or has certain medical 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 low attendance at school
- is on a part-time timetable, or had been repeatedly removed from the classroom
- 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 shown early signs of abusive, violent or harmful behaviours towards others
- 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 pregnant or is a parent themselves
- has had an adverse childhood experience (ACE) or trauma
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a looked after child, previously looked after child or a privately fostered child.

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

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 Services and/or the Police. Any such referral must be made without delay; staff should not wait until the end of the school day, or for the DSL/DDSL to become available, where urgent action is needed to protect a child.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they must follow the Four Rs:

- **Recognise** vulnerability factors, and look out for changes in well-being, presentation or behaviour.
- **Report** any suspected signs of abuse or safeguarding concerns to your DSL/DDSL immediately.
- **Record** matters in writing, via CPOMS or on paper to your DSL.
- **Refer** to relevant support, such as Children's Services or the Police, as needed.

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.

Parental consent is not needed for referrals to statutory agencies such as the Police and Children's Services. 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.

Staff should challenge any inaction and follow this up with the DSL/DDSL and Children's Services as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

14. 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 Services 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 Services.

15. 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 Services 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.

16. 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.

Staff should report any concern about a child using, carrying, or expressing an intention to use a weapon to the DSL/DDSL immediately. The DSL/DDSL will assess the risk, consider any need for de-escalation of peer conflict, and take appropriate safeguarding action, including referral to Children's Services and/or the Police where required.

17. Responding 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 includes the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online, including content that is digitally altered or wholly generated using artificial intelligence. Further definitions and examples are set out in Appendix 1.

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 report 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"* 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 D/DSL
- carrying out interviews with the children involved (if appropriate)
- informing parents and guardians at an early stage and keeping them involved in the process 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 Services 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 Services 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. 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.

18. 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.

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 the local authority 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 via 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 the local authority where school absence indicates safeguarding concerns the Foundation will have regard to the Department for Education's guidance '*Working together to improve school attendance*'.

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.

Further and full details of the Foundation's procedures for unauthorised absence and for dealing with children who go missing from education can be found in the **Foundation's Attendance Policy** and **Missing Child Policy**.

19. 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 and this occurs via referral to Children's Services.

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.

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.

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

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an

indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The Foundation aims to prevent mental health problems by promoting a whole school approach to support social and emotional well-being of our pupils, and to support those with mental health challenges by joining them with appropriate support pathways.

To support early identification, staff should be alert to possible indicators that a child may require mental health support, including significant changes in behaviour, low attendance, ongoing difficulty sleeping, withdrawal from social situations, loss of interest in activities they usually enjoy, physical signs of self-harm, or neglecting themselves. Staff should follow the four Rs if they have concerns about the mental health of a child, and in doing so contact the DSL / DDSL.

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.

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 Designated Mental Health Lead as well as a School Counsellor. 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.

Further and full details of our approach to supporting mental health can be found in the Foundation's **Mental Health and Well-being Charter**.

21. 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**.

Further information is in Section 26 of this policy and full details of our low-level concerns approach and procedures can be found in the Foundation's **Low-Level Concerns Policy**.

22. What staff should do if they have concerns about safeguarding practices within the Foundation

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 practices, these should be raised with the Designated Safeguarding Lead who has responsibility for this area. The DSL will listen to the concerns raised and address them in line with this policy and statutory guidance.

If this is not effective in resolving concerns, staff have recourse to 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 Foundation 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.

23. Arrangements for dealing with child-on-child abuse allegations

Child-on-child abuse is abuse by one or more children against another child. It can happen inside or outside school, and online, and may occur as a standalone incident or as part of a wider pattern of abuse, neglect or exploitation. Further definitions and examples, including sexual violence, sexual harassment, harmful sexual behaviour and sharing of nudes and semi-nudes, are set out in Appendix 1.

These arrangements apply to all reports and concerns of child-on-child abuse, including where the alleged behaviour has taken place outside school or online. Abuse that occurs online or outside school will not be downplayed and will be treated equally seriously.

The Foundation takes a zero-tolerance approach to child-on-child abuse. Abusive comments, sexual comments, sexual jokes, online sexual harassment, discriminatory language, prejudice-based harm, faith-targeted abuse, misogynistic or misandrist behaviour, and physical behaviours such as grabbing bottoms, breasts or genitalia, pulling down clothing, flicking bras, lifting skirts or other potentially criminal behaviour will never be dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys". Dismissing or tolerating such behaviours risks normalising them.

Children will be made aware of how they can report abuse and what will happen once a report has been made. Reporting routes for pupils are easily understood and accessible, including through a pupil's pastoral team, worry boxes and reporting forms on Firefly.

The Foundation recognises that even where there have been no reports of child-on-child abuse, such abuse may still be taking place and may not have been reported.

Responding to a report

All reports of child-on-child abuse, including child-on-child sexual violence and sexual harassment, will be taken seriously. Staff must act immediately and follow the safeguarding procedures in this policy. Staff must not investigate reports themselves, ask leading questions, or seek to establish whether an allegation is proven. Their role is to listen, reassure, recognise and report the concern to the DSL or DDSL without delay.

When responding to a child, staff should reassure them that they are being taken seriously, that they will be supported and kept safe, and that they have done the right thing by speaking to someone. The child must not be made to feel ashamed, blamed, or given the impression that they are creating a problem by making a report. The Foundation will avoid any response which could be perceived as victim-blaming, including questions or comments about what the victim was wearing, their previous behaviour, whether they had been drinking or using substances, or why they did not report the matter earlier.

Initial safeguarding action

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 must follow the safeguarding procedures in this policy rather than dealing with the matter solely under the Foundation's Anti-Bullying or Behaviour Management policies.

The DSL/DDSL will consider the report on a case-by-case basis, taking account of the best interests of the child, the wishes and feelings of the victim, the nature of the alleged incident, the ages and developmental stages of the children involved, any power imbalance, any pattern of behaviour, and any ongoing risk to the victim, alleged perpetrator or wider pupil body.

Deciding the appropriate response

Following a report of child-on-child abuse, including sexual violence or sexual harassment, the DSL or DDSL will decide the appropriate response on a case-by-case basis. This may include:

- managing the matter internally where it is appropriate and safe to do so;
- proposing Early Help;
- seeking advice from Family Front Door and making a referral to Children's Services;
- reporting the matter to the Police.

Any decision will be recorded, together with the reasons for that decision and any advice received from external agencies.

Where a report involves rape, assault by penetration or sexual assault, the Police will be informed. The Foundation may also report other harmful sexual behaviours which are potentially criminal in nature, including physical sexual harassment such as grabbing bottoms, breasts or genitalia.

Confidentiality, information sharing and parental involvement

Where a report has been made to the Police, the Foundation will work with the Police and any other relevant agencies to agree what information can be disclosed to staff, children, parents and guardians, including the alleged perpetrator and their parents or guardians.

The victim may ask the Foundation not to tell anyone about their report. The DSL/DDSL will consider

the child's wishes carefully, but these will be balanced against the Foundation's duty to safeguard the victim and other children. Where a child is at risk of harm, is in immediate danger, has been harmed, or where a crime may have been committed, a referral to Children's Services and/or the Police may be required.

Parents and guardians will usually be informed as soon as possible, unless doing so would put the victim or another child at greater risk. Where the DSL/DDSL decides to make a referral to Children's Services or a report to the Police against the victim's wishes, the reasons should be explained to the child in a way that is appropriate to their age and understanding, and ongoing support should be offered.

Information about a report will only be shared with those who need to know in order to safeguard children, support the children involved, or meet statutory duties. The Foundation will consider carefully what information can be shared with staff, pupils, parents and guardians, particularly where the Police or Children's are involved.

Risk and needs assessment

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

The risk and needs assessment will consider:

- the victim, including their protection and support needs;
- whether there may have been other victims;
- the alleged perpetrator, including their support and supervision needs;
- all other children, and where appropriate staff, at the Foundation;
- any actions needed to protect children from further harm.

Risk and needs assessments will be recorded and kept under review. Where appropriate, the Foundation will consider proportionate adjustments to timetables, seating plans, supervision arrangements, transport and co-curricular activities to minimise contact between the victim and alleged perpetrator while safeguarding all children involved.

Support for children involved

In all cases of child-on-child abuse, the Foundation will consider the safeguarding and welfare needs of all children involved, including the victim, the alleged perpetrator and any other affected children. Children involved will be supported by pastoral staff and, where appropriate, external agencies.

The Foundation recognises that children with SEND, certain health conditions, communication barriers, mental health needs or other vulnerabilities may face additional barriers to reporting abuse or may be disproportionately affected by child-on-child abuse.

The Foundation also recognises that sexual violence and sexual harassment are more likely to be experienced by girls and are more likely to be perpetrated by boys, but that they can occur between children of any sex.

Safeguarding and disciplinary action

Any disciplinary action will be considered separately from, and will not replace, safeguarding action. The Foundation will ensure that any disciplinary response does not compromise a statutory investigation or place any child at further risk. Suspension or other sanctions may be considered where appropriate, but decisions will be proportionate, recorded and informed by safeguarding considerations and, where relevant, advice from external agencies.

Recording, review and learning

The Foundation will keep a written record of all concerns, discussions, decisions and actions taken, including the reasons for decisions and any advice received. Records will be stored securely and shared only with those who need to know.

The Foundation will reflect on reported concerns, decisions made and actions taken in order to identify patterns of concerning, problematic or inappropriate behaviour, any unsafe culture, or any weaknesses in safeguarding systems. Where patterns or themes are identified, the Foundation will take appropriate action, which may include additional education, staff training, pupil voice work, supervision changes, policy review or wider cultural work.

In the event that a report is found to be false, unsubstantiated, unfounded or malicious, the DSL/DDSL will consider whether the child who made the allegation, or any other child involved, is in need of help or may have been abused by someone else. A referral to Children's Service may be appropriate. If a report is shown to have been deliberately invented or malicious, the Head of Foundation will consider whether disciplinary action is appropriate in accordance with the Foundation's Behaviour Management policy.

24. Dealing with safeguarding concerns or allegations of abuse about staff, trainee teachers, volunteers and contractors

The Foundation's procedures for managing allegations against staff, trainee teachers, 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 it sets out.

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 promptly, 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 Governors, clerk@ksw.org.uk.
- If an allegation is reported to the DSL/DDSL, the DSL/DDSL will inform the Head of Foundation.
- 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 promptly 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, the case manager should contact Children's Services 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 Services. 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 Services.
- 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 Services. 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 account of their views. It should be made 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, *Working Together to Safeguard Children* and *Keeping Children Safe in Education* 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 Services 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 *Keeping Children Safe in Education* 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.

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 to the LADO.

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

Where external organisations or individuals use Foundation premises, written agreements will set out safeguarding expectations, including the provider's responsibility to have appropriate safeguarding arrangements, to liaise with the Foundation where necessary, and to report safeguarding concerns or allegations to the Foundation and, where appropriate, the LADO or other statutory agencies.

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 Services.

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.

Where services or activities are not under the direct supervision or management of the Foundation, the Foundation will seek proportionate assurance that the provider has appropriate safeguarding and child protection arrangements in place and will rely on the written agreement described above to confirm reporting and liaison expectations.

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 *Keeping Children Safe in Education* 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.

26. Arrangements for dealing with low-level concerns

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 and full details of the low-level concerns approach and procedures can be found in the Foundation's **Low-Level Concerns Policy**.

27. Safer Recruitment

The Foundation is committed to safer recruitment and to preventing people who may pose a risk of harm from working with pupils. Safer recruitment is embedded throughout the recruitment, selection, appointment and induction process for all staff, governors, volunteers, supply staff, agency staff, contractors and any other adults working in or on behalf of the Foundation. The Foundation will act in accordance with Part Three of *Keeping Children Safe in Education 2026*, the Disclosure and Barring Service requirements, the Teachers' Disciplinary (England) Regulations 2012 and all relevant legislation.

The Foundation will ensure that at least one person involved in any appointment panel has undertaken safer recruitment training. Recruitment materials will make clear the Foundation's commitment to safeguarding and promoting the welfare of children. Application forms, shortlisting, interviews and references will be used to explore candidates' suitability to work with children, including their understanding of safeguarding, professional boundaries and conduct. The Foundation will consider any gaps in employment, contradictory information, concerns arising from references, and any other information which may indicate a safeguarding risk.

As part of the shortlisting process, the Foundation may carry out online searches on shortlisted candidates to help identify any incidents or issues that are publicly available online and may need to be explored with the applicant. Any such searches will be proportionate, relevant to safeguarding and suitability, and will be conducted consistently and with due regard to data protection requirements.

The Foundation will obtain and scrutinise appropriate references before appointment wherever possible. Any concerns arising from references will be followed up and resolved before appointment is confirmed.

Before any person starts work, the Foundation will complete all required pre-appointment checks appropriate to the role. These will include verification of identity, right to work in the UK, professional qualifications where required, prohibition from teaching checks where applicable, checks of any section 128 direction where relevant to management roles in an independent school, an enhanced DBS check and children's barred list information where the role is in regulated activity, and any further checks required because the person has lived or worked outside the UK.

No person will be allowed to start work in regulated activity until the required barred list check has been completed. Where an enhanced DBS certificate is required but has not yet been received, the Foundation may only allow the individual to start work in exceptional circumstances, after a separate barred list check has been completed, a written risk assessment has been undertaken, and appropriate supervision and safeguards have been put in place until the DBS certificate is received.

For roles within the EYFS settings, individuals must not begin working in the setting until the Foundation has received the applicant's enhanced DBS certificate including barred list information, in accordance with the EYFS statutory framework.

The Foundation will maintain a Single Central Record of recruitment and vetting checks for all staff, including teacher trainees, agency and third-party supply staff, volunteers, governors and other individuals as required. The Single Central Record will record whether each required check has been completed, the date on which it was completed. The Foundation will quality assure the Single Central Record regularly and governors will maintain oversight of compliance through safeguarding governance arrangements.

Volunteers – The Foundation will make a risk-based assessment of volunteers and complete the checks required by *Keeping Children Safe in Education 2026*. A volunteer undertaking regulated activity with children will be subject to an enhanced DBS check with children's barred list information. The Foundation will not use a barred person as a volunteer in regulated activity. For volunteers not undertaking regulated activity, the Foundation will determine the appropriate level of check and supervision, taking account of the nature, frequency and context of the role, what the volunteer will do, whether they will be supervised, and any information known about them.

The Foundation will ensure that agency, supply and third-party staff have been subject to the required safer recruitment checks. Written confirmation will be obtained from the relevant agency or organisation that the appropriate checks have been completed, including identity, right to work, enhanced DBS and barred list checks where applicable, prohibition checks where relevant, and any further overseas checks. The Foundation will verify the identity of agency and supply staff on arrival and will ensure that safeguarding concerns or allegations relating to such staff are managed in accordance

with this policy and local safeguarding procedures.

Contractors and adults working on the Foundation's premises will be subject to proportionate safeguarding arrangements. The Foundation will obtain assurance that contractors have completed appropriate checks on their staff where required, will confirm identity on arrival, and will ensure that adults who have not been appropriately checked are not left unsupervised with pupils.

Where external organisations use Foundation premises, written agreements will set out safeguarding expectations, including safer recruitment responsibilities and the requirement to report safeguarding concerns or allegations to the Foundation and, where appropriate, the LADO or other statutory agencies.

The Foundation recognises that safer recruitment does not end at appointment. All new staff, governors, volunteers and relevant adults will receive safeguarding induction appropriate to their role, as set out in Section 29. Ongoing suitability will be monitored through supervision, line management, self-disclosure expectations, safeguarding training, low-level concerns processes and the Foundation's culture of openness, professional curiosity and challenge.

Further and full details of safer recruitment procedures can be found in the Foundation's **Recruitment, Selection and Disclosure Policy** and **Code of Conduct for Contractors**.

28. Management of Safeguarding

The Foundation's **Designated Safeguarding Leads** are members of the Foundation Leadership Team.

If the relevant DSL is absent the **Deputy Designated Safeguarding Leads** are the people 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 Foundation has in place.

Where a pupil leaves the Foundation, including for in-year transfers, the relevant DSL will also ensure their safeguarding 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, insofar as is possible. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the safeguarding 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.

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 phone or email. 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 *Working Together to Safeguard Children*.

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 how to access this support when required.

Full details of the DSL role can be found at Annex C of *Keeping Children Safe in Education 2026*.

29. Training

All staff, including Governors, need induction and training to understand their ongoing responsibilities in relation to safeguarding. The Foundation ensures that all staff read and understand Part One of *Keeping Children Safe in Education 2026* and have mechanisms in place to support them to understand and discharge their safeguarding roles and responsibilities.

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

- the Safeguarding and Child Protection policy
- 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 required to:

- read and understand Part One of *Keeping Children Safe in Education* and confirm that they have done so.
- receive training in safeguarding and child protection at least annually to provide them with relevant skills and knowledge to safeguard 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 take 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, promoting a culture of listening to children, emerging safeguarding trends and local context. Prevent Single Points of Contact have enhanced training to equip them to execute this role. Further details of the required training content for the DSLs and DDSLs are set out in Annex C of *Keeping Children Safe in Education 2026*.

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. DSLs and DDSLs have access to external supervision sessions.

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.

30. Governor Oversight

The Governing Body has strategic leadership responsibility for the Foundation's safeguarding arrangements and ensures that it complies with its legislative duties. The governing body has regard to *Keeping Children Safe in Education 2026* and ensures that policies, procedures, training and monitoring arrangements in the Foundation are effective, compliant and subject to regular assurance. 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 suspected abuse, neglect and exploitation, are understood and followed by all staff.

Sue Hincks and Janet Clarke 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' Education committee has an overview of safeguarding and a termly report is made to the governing body.

A review of the Foundation's Safeguarding and Child Protection policy takes place at least annually. The DSLs and board-level safeguarding leads meet termly, and the governing body receives termly safeguarding information and a fuller annual report outlining key safeguarding issues, strengths and areas for development.

31. Teaching Children How to Keep Safe

The Foundation recognises that schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares young people for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

The Foundation ensures that all pupils are taught about matters relating to safeguarding through the PSHE and RSE curriculum, safeguarding assemblies 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.

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.

Relationships and Sex Education is compulsory and forms part of the spiral curriculum of PSHE at King's. The Foundation understands that preventative education in this area is most effective in the context of a whole school approach in preparing children for life.

Further and full details of our approach to RSE can be found in the Foundation's **RSE Policies on the Foundation's website**.

32. Online Safety

Technology-facilitated abuse and exploitation is a growing area of risk for children. All staff should be aware that technology, including artificial intelligence tools, is a significant component in many safeguarding matters and should recognise that children are at risk of abuse online as well as face-to-face.

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, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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, including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, using AI to create or alter harmful images, sharing other explicit images, online bullying, and creating or spreading harmful misinformation, disinformation or

manipulated content.

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, the Acceptable Use Policies for both staff and pupils, and communication with parents and guardians to recommend online safety support resources.

Filtering and Monitoring

The Foundation has appropriate filtering (Smooth Wall and Sophos) 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 may have unlimited and unrestricted access to the internet via mobile phone networks which means that children may engage with harmful content whilst at school undetected.

The Foundation ensures compliance with the Department for Education'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;
- undertaking an annual review with the DSL and IT Lead to document the efficacy of filtering and monitoring arrangements, which is then reported to the Foundation Leadership Team;
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- and training staff about their roles and responsibilities and refreshing this training.

Mobile phones

All schools should be mobile phone-free environments by default; anything other than this should be by exception only. The Department for Education's statutory guidance on *Mobile phones in schools* expects schools to implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

In the Prep Schools, pupils are not allowed to bring mobile phones to school and must hand them in if they do. Pupils in the Senior School from Lower Fourth to Fifth Form are not allowed to use phones during the school day and must keep their phones in Yondr pouches. Sixth Form pupils may use mobile phones only in designated social spaces around the school site, as a limited exception to the Foundation's default mobile phone-free approach.

Further and full details of our approach to mobile phones can be found in the Foundation's **Mobile Phones at King's** document.

33. Looked After Children and Children in Kinship Care

The Deputy Head Pastoral in the Senior School and the Heads in the Prep Schools are the designated members of staff who have responsibility for promoting the educational achievement and welfare of looked after children, previously looked after children and children in kinship care. The Foundation ensures that the designated members of staff receive appropriate training so that they have the skills, knowledge and understanding necessary to keep safe and support any children on roll who are looked after by a local authority, previously looked after or in kinship care.

34. Children with special educational needs, disabilities or medical 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. Children with SEND are more likely to be victims of abuse, including sexual harassment.

Children with SEND may:

- face assumptions that indicators of possible abuse, neglect or exploitation such as behaviour, mood and injury relate to the child's condition without further exploration
- be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- experience communication barriers and difficulties in managing or reporting these challenges
- be 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 SENCO. The SENCO and the DSL/DDSL will also maintain regular liaison so that safeguarding information, SEND needs, reasonable adjustments, communication support and pastoral concerns are considered together where this is necessary to safeguard or promote the welfare of a

pupil. This liaison will include, where appropriate, reviewing patterns of concern, attendance, behaviour, mental health, bullying, online safety incidents and any changes in presentation for pupils with SEND or disabilities.

Whilst administrative issues or general incidents in managing a medical condition or allergy do not automatically trigger a safeguarding response, this may be necessary if an incident or pattern suggests that a child is at risk of neglect, abuse, or exploitation, for example if the school is not given appropriate information about a serious medical condition or a child is repeatedly sent to school without essential, life-saving medication.

Further information can be found in the Department for Education'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*

35. Children who are Lesbian, Gay or Bisexual

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 vulnerable to discriminatory bullying.

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.

Risks can be compounded where children lack a trusted adult with whom they can be open. The Foundation will reduce additional barriers, respond promptly to discriminatory bullying or unsafe peer culture, and create a culture in which pupils can speak out or share concerns with members of staff.

36. Children who are Questioning their Gender

When supporting a child who is questioning their gender, the Foundation takes a child-centred and safeguarding-led approach, considering the child's individual voice and needs, any wider vulnerabilities, parental involvement, and any relevant clinical advice.

The Foundation makes decisions to support children who are questioning their gender in line with the following principles as set out in *Keeping Children Safe in Education*:

- Schools and colleges have statutory duties to safeguard and promote the welfare of all children
- Parents and guardians should be actively involved and their views treated with importance
- Accommodating social transition is an active intervention so schools should take a very careful approach
- Schools and colleges should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

37. Use of Photography or Video of Pupils

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).

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 Record. 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 in EYFS
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, trainee teachers, volunteers, Governors and pupils).

DSL for the EYFS
The staff designated to take lead responsibility for safeguarding children in the early years settings in the Prep Schools are:

For King's Hawford	Emma Lane and Stefanie Danks – 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 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 more frequent intervals if there are legislative changes and/or the evaluation of the policy highlights a need for review.

Appendix 1 – Types and Signs of Abuse

All Foundation staff should be aware that abuse, neglect, exploitation and wider safeguarding issues are rarely standalone events and cannot always be captured by one definition or label alone. In most cases, multiple issues may overlap; staff should therefore remain vigilant and professionally curious, and raise any concerns or questions with the DSL / DDSL without delay. The table below is not exhaustive and some children may not outwardly show signs of abuse, neglect or exploitation.

Definition	Signs and indicators
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.	• Unexplained injuries, burns or scalds • Inconsistent or implausible explanations • Fearfulness, flinching or withdrawal • Frequent injuries • Signs illness may have been fabricated or induced
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 include making a child feel worthless, unloved, inadequate or valued only insofar as they meet another person's needs; limiting expression; imposing inappropriate expectations; exposure to ill-treatment; serious bullying, including cyberbullying; exploitation or corruption. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.	• Low self-esteem or self-blame • Withdrawal, anxiety or fearfulness • Developmental delay or emotional distress • Social isolation • Signs of bullying, including cyberbullying • Behaviour suggesting the child feels unsafe, silenced or devalued
Neglect	
The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. This may include failure to provide adequate food, clothing and shelter; protect from harm or danger; ensure adequate supervision; ensure access to medical care or treatment; or respond to basic emotional needs.	• Hunger, poor hygiene or unsuitable clothing • Frequent tiredness • Untreated medical needs • Poor attendance • Lack of supervision • Exclusion from home or abandonment • Developmental delay or emotional unresponsiveness

Sexual abuse	
Involves forcing, causing or inciting 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women and children can commit sexual abuse. Children are more likely to know their abuser than not. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.	• Sexualised behaviour or language beyond expected development • Disclosure or partial disclosure of sexual activity or contact • Unexplained changes in behaviour, distress, withdrawal or fearfulness • Signs of grooming, coercion, intimidation or exploitation, including online • Concerns relating to sexual violence, sexual harassment, or non-consensual sharing of images • Physical indicators or health concerns, including sexually transmitted infections or pregnancy

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 – 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 (HSB) can occur between children of any age and sex, online, face-to-face, or both, and may involve one child, a group of children, or a group targeting an individual child or another group. HSB exists on a continuum from inappropriate or problematic behaviour through to abusive or violent behaviour, and may escalate into sexual harassment or sexual violence. The Foundation adopts a zero-tolerance approach to HSB, sexual harassment and sexual violence: such behaviour is never acceptable, will not be tolerated, and will not be dismissed as "banter", "boys being boys", "part of growing up" or "just having a laugh". Staff should recognise that the absence of reports does not mean that HSB is not happening, and should be alert to the escalatory nature of misogyny and other harmful attitudes. Early identification and intervention are essential to prevent escalation, challenge potentially criminal behaviours such as unwanted sexual touching or intrusive physical acts, and ensure that all incidents—including the sharing of nude or semi-nude images, whether consensual or non-consensual—receive a safeguarding response.

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 self-generated intimate images. 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 nude and semi-nude images and videos.

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 / UKCIS 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.

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, disrupted education or permanent exclusion from school, experience of child maltreatment or a history of offending.

Child sexual exploitation (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) 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 exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse and relevant child protection procedures must be followed if modern slavery or trafficking is suspected

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.

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.

Prejudice-based harm: children may experience harm arising from racism, faith-targeted abuse, discriminatory behaviour or other prejudice-based incidents. Such experiences may affect a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

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.

The Foundation participates fully in Operation Encompass which is the sharing of information between the Police and schools concerning domestic abuse involving children.

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.

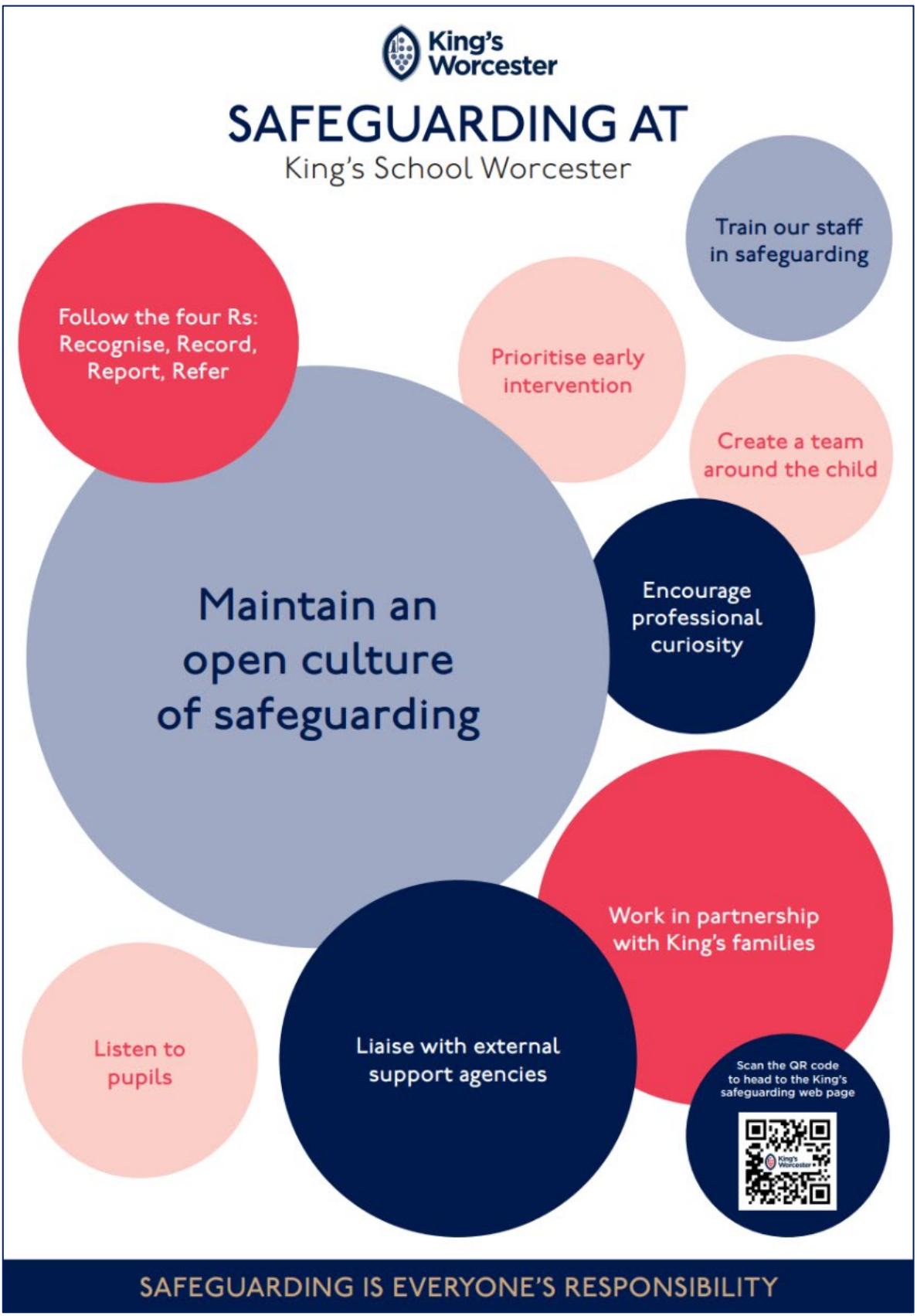
Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent, guardian or anyone with legal responsibility for the child. Child abduction can be committed by parents, guardians or other family members; by people known but not related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

Appendix 2 – Foundation Safeguarding Culture Poster