SAFEGUARDING AND CHILD PROTECTION POLICY

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Warwick Schools Foundation

This policy applies to Warwick Schools Foundation including Warwick School with Warwick Junior School, King's High School, Warwick Preparatory School and The Kingsley School.

Regulatory	Yes
Version	1.0
Author and Reviewer	Foundation DSLs and Principals Group
Approving Body	Safeguarding Governors and Full Board
Date Approved	September 2026
Review Cycle	Annual - This policy is updated as issues emerge or updates are issued, and evolves to reflect lessons learned
Previous Review Date	Summer 2025
Next Review Date	Summer 2027

Warwick Schools Foundation (WSF) Safeguarding Pledge:

As a member of WSF, I pledge to:

- **Prioritise the welfare and safety of all pupils, ensuring they feel secure and supported**
- **Create an environment of trust where pupils feel confident to express concerns**
- **Follow Foundation policies and procedures**
- **Recognise and promptly respond to any safeguarding risks with diligence and care.**
- **Promote a culture of vigilance, where safeguarding is a shared responsibility**
- **Champion inclusivity and respect, ensuring every child is treated with dignity, free from discrimination or harm**
- **Continuously improve and uphold best practices in safeguarding through training, awareness, and proactive engagement**

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What to do if you are concerned a child is in immediate danger/or risk of harm:

DSL at WPS (including EYFS): Deborah Ward

DSL at KHS: Lisa Whittington

DSL at WS: Richard Thomson

DSL at WJS Heather Mellor

DSL at TKS: Martha Bruchez

DSL for PS: Rebecca Jessup

What to do if you are concerned a child is in immediate danger/or risk of harm:

In an emergency take the action necessary to help the child e.g. call 999

Speak to the DSL (or DDSL if DSL unavailable) immediately if there is evidence of physical or sexual abuse and as quickly as possible (and certainly by the end of the same day) for other risks.

Use *MyConcern*
(for ALL staff able to access *MyConcern*)
Always talk to the DSL after submitting

OR
Complete a GREEN FORM
(only for staff WITHOUT access to *MyConcern*)
Hand it to the DSL

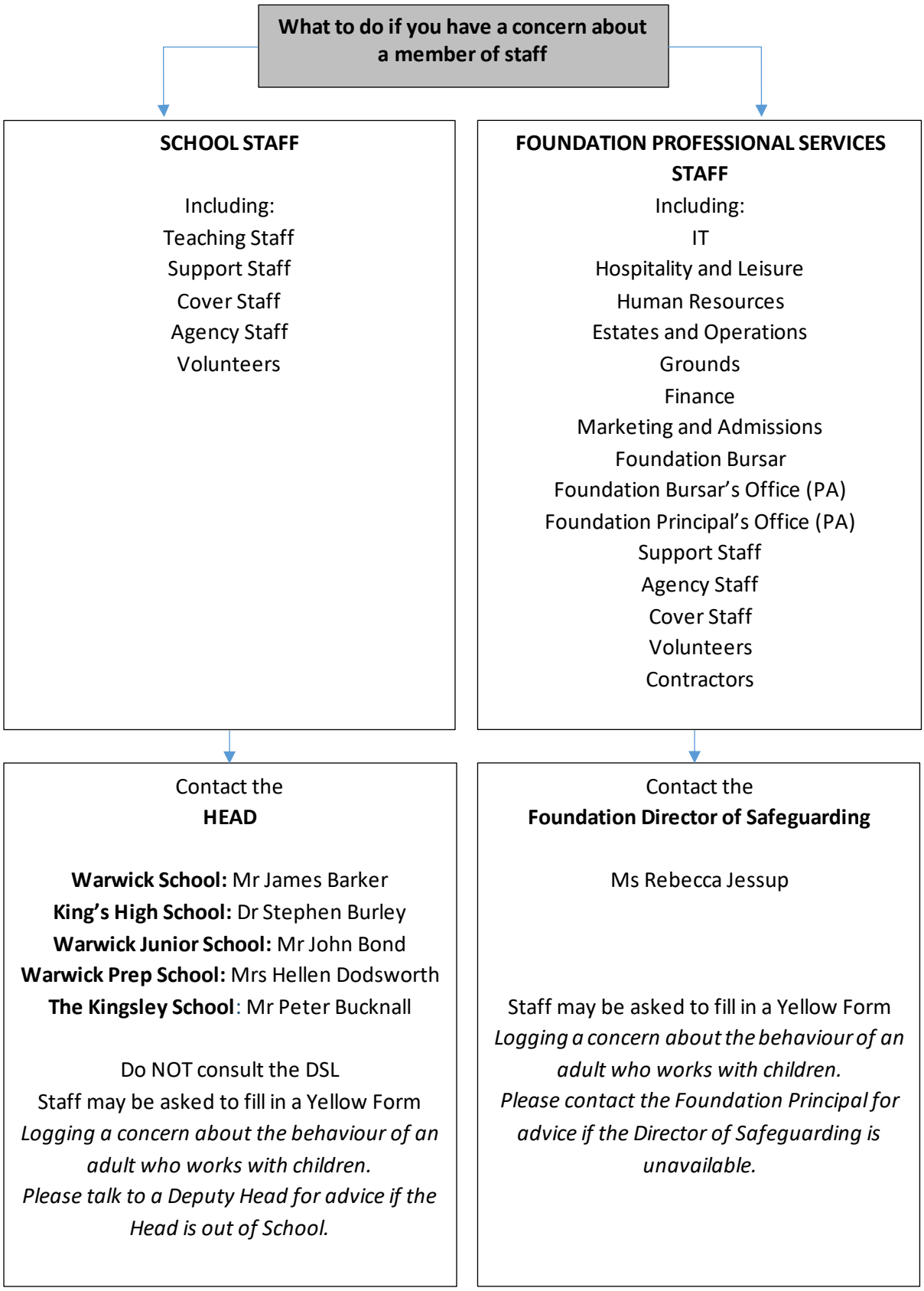
Staff and parents can make contact directly to
Family Connect
01926 414144
Monday-Thursday 08:30-17:30 and Friday 08:30-17:00
01926 886922 (out of hours)
Please inform the DSL as soon as possible if you have made your own referral

If staff have a concern but the child is not in immediate danger/or risk of harm:

EITHER
Use *MyConcern*
(for ALL staff able to access *MyConcern*)
Always talk to the DSL after submitting

OR
Complete a GREEN FORM
(only for staff WITHOUT access to *MyConcern*)
Hand it to the DSL

Parents are advised to contact the relevant DSL to discuss their concerns.



- *If the concern relates to the Director of Safeguarding, please refer to the Foundation Principal.*
- *If the concern relates to a former staff member, please refer to Section 14 for further information.*

What to do if you have a concern about a Headteacher

Concerns about Warwick School Head Master **Mr James Barker**	Concerns about King's High School Head Master **Dr Stephen Burley**	Concerns about Warwick Junior School Headmaster **Mr John Bond**	Concerns about Warwick Prep School Head Mistress **Mrs Hellen Dodsworth**	Concerns about The Kingsley School Head of School **Mr Peter Bucknall**
Contact **Chair of Foundation Governors** Mrs Jane Mackenzie-Lawrie 07899 064548 *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in	Contact **Chair of Foundation Governors** Mrs Jane Mackenzie-Lawrie 07899 064548 *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in	Contact **Head Master of Warwick School** Mr James Barker *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in a Yellow Form	Contact **Head Master of Kings High School** Dr Stephen Burley *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in a Yellow Form	Contact **Chair of Foundation Governors** Mrs Jane Mackenzie-Lawrie 07899 064548 *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in a Yellow Form

What to do if you have a concern about a Governor
What to do if you have a concern about the Chair of Foundation Governors

What to do if you have a concern about a Governor	What to do if you have a concern about the Chair of Foundation Governors **Mrs** Jane Mackenzie-Lawrie	What to do if you have a concern about the Foundation Principal **Mr Richard Nicholson**
Contact **Chair of Foundation Governors** Mrs Jane Mackenzie-Lawrie (07899 064548) *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in a Yellow Form	Contact **The Vice-Chair of Foundation Governors** Mr David Loudon (please contact the school for their details) *who will inform the Foundation Principal, Mr Richard Nicholson* Staff may be asked to fill in a Yellow Form	Contact **Chair of Foundation Governors** Mrs Jane Mackenzie-Lawrie (07899 064548) Staff may be asked to fill in a Yellow Form

If **staff** have concerns about another member of staff, they can make a referral to LADO: (**LADO does not accept referrals about staff from parents/carers)**

Ring the Local Authority Designated Officer (LADO) 01926 745376. And/or complete a referral form and send it to lado@warwickshire.gov.uk

The LADO is responsible for coordinating responses to allegations against people who work with children.

Ring the Police 999 or Family Connect 01926 414144. This should be done if the child is at immediate risk of harm or neglect

In addition, **staff** can: **Contact the NSPCC Whistleblowing Helpline 0800 028 0285** or e-mail help@nspcc.org.uk.

This is available **for staff** who cannot raise concerns regarding child protection issues internally. Information is also available on the NSPCC website.

1.0 Purpose and Aim

The Foundation aims to:

- Reduce risk and prevent harm to children.
- Promote pupils' well-being and a school culture of safety, equality, and protection.
- Safeguard and promote the welfare of children, staff, and others associated with the school.
- Implement clear procedures for dealing with and referring concerns, including allegations of abuse, neglect, and exploitation.
- Raise awareness on how to report concerns and ensure they are current and historically investigated.
- Ensure staff understand and fulfil their safeguarding responsibilities, supported by appropriate training.
- Maintain consistent safeguarding practices across all schools within the Foundation.
- Enable children to report incidents, with staff prepared to respond effectively and confidently.
- Ensure timely and appropriate responses to identified risks and harm.
- Comply with relevant laws and guidance, including the Children Act 2004 and the Education Act 2002.
- Adhere to statutory guidance such as Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children, and The Prevent Duty.

2.0 Policy Statement, Values, and Principles

The Foundation aims to:

The Foundation's safeguarding arrangements are inspected by the Independent Schools Inspectorate (ISI) as part of their evaluation of Leadership and Management. Additionally, these arrangements influence the ISI's judgment on the Personal Development, Behaviour, and Welfare of children. For more information, you can refer to the ISI's statutory guidance at https://www.isi.net/safeguarding/statutory-guidance.

The relevant statutory guidance on multi-agency working is Working Together to Safeguard Children. Working Together to Safeguard Children

The Foundation's adherence to this guidance is inspected under paragraph 7 of the Independent School Standards Regulations.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800615/Independent_School_Standards-_Guidance_070519.pdf

This policy is available on each School's website. All staff and volunteers are required to read and confirm they have done so in writing before commencing work in the Foundation.

The Foundation Policy covers all areas of school including EYFS and covers all safeguarding issues in line with Section 3 of the Early Years Foundation Stage Framework 2026. More

detailed information regarding EYFS procedures can be found in the relevant school's policies. Warwick Prep School EYFS Policy and The Kingsley School EYFS Policy.

3.0 Definition of Safeguarding

Safeguarding is the proactive work done to protect children from harm, promote their welfare, and ensure they grow up in safe, healthy environments. It applies to **all children** in our care and community and is **everyone's responsibility**. Key safeguarding actions include:

- Providing early help and support
- Protecting children from all forms of abuse and maltreatment (including online)
- Preventing mental and physical health impairment
- Ensuring safe and effective care environments
- Taking action for the best possible outcomes for every child

Child Protection is a specific aspect of safeguarding focused on children suffering or likely to suffer significant harm. It involves statutory intervention, often including Children's Social Care and/or the Police. The key principle is that the child's welfare is paramount. (KCSiE).

Key Actions for Staff

- Respond early to concerns - don't wait for certainty
- Make referrals if there is a risk of immediate serious harm - anyone can refer
- If concerns persist, escalate to the DSL, Head, or contact Family Connect
- Be alert to changes in behaviour, appearance, or communication
- Be approachable, listen actively, and follow reporting procedures

All staff are accountable and follow the Foundation Code of Conduct. Any concerns or allegations of misconduct, including wellbeing concerns for staff, are shared swiftly and at the earliest opportunity to maintain a strong safeguarding culture.

All staff are aware of their responsibility to share low-level concerns with equal urgency to ensure all children are supported in an environment of openness, trust, and transparency. Children and staff involved in safeguarding and child protection issues will receive appropriate support.

The Foundation is committed to creating an environment where staff feel able to raise any concerns and feel supported in their safeguarding role.

Contact Information

- **Family Connect (Mon–Thurs, 8:30am–5:30pm / Fri, 8:30am–5:00pm):**
  📞 *01926 414144*
- **Out of Hours Emergency Duty Team:**
  📞 *01926 886922*
- **Urgent Safeguarding Email (if phone unavailable):**
  📧 *TriageHub@Warwickshire.gov.uk*
- **Immediate Risk – Contact Police:**
  📞 *999*

4.0 Safeguarding Legislation and Guidance

Section 157 of the Education Act 2002 and the **Education (Independent School Standards) Regulations 2014** which require proprietors of academies to plan to safeguard and promote the welfare of children who are pupils at the school.

The **Teachers' Standards 2013 (updated 2021)**, state that teachers, including Headteachers, must have regard for the need to safeguard pupils' well-being, follow statutory provisions, and uphold public MAT in the teaching profession.

Keeping Children Safe in Education (KCSIE) which incorporates:
Additional statutory guidance, including *Disqualification under the Childcare Act 2006* (September 2018), for staff working with or around children under 8 years old.

Non-statutory advice: *What to do if you are worried a child is being abused* (March 2015), to help all practitioners identify and respond to abuse and neglect.

Statutory Framework for the Early Years Foundation Stage (DfE, September 2026)

West Midlands Regional Safeguarding Procedures: https://westmids.trixonline.co.uk/
Relationships Education, Relationships and Sex Education (RSE), and Health Education in England informs the content and delivery of safeguarding education within the Foundation's PSHEE provision. Each school's RSHE/PSHEE policy provides further details.

Warwick Prep School and The Kingsley School also follow the Early Years Foundation Stage Framework and other related DfE publications around the safeguarding of children in the Early Years.

https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2
Following the statutory **Prevent Duty Guidance** for England and Wales, https://www.gov.uk/government/publications/prevent-duty-guidance**,** Foundation policies and procedures have 'due regard to the need to prevent people from becoming involved with or supporting terrorism', *Counter Terrorism and Security Bill* https://www.gov.uk/government/collections/counter-terrorism-and-security-bill and Use of Social Media for Online Radicalisation (July 2015) advice is followed.

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found in Equality Act (2010): advice for schools. For further information, please see Equality Act guidance - Equality and Human Rights Commission.

Equality Act 2010

Schools and colleges have obligations under the Equality Act (2010). According to the Equality Act, schools and colleges **must** not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender, pregnancy and maternity, or sexual orientation (protected characteristics).

(for further information, See https://www.legislation.gov.uk/ukpga/2010/15/contents)

The Foundation's charity law safeguarding duty is to:

- provide a safe and trusted environment that safeguards anyone who comes into contact with it, including beneficiaries, staff, and volunteers.
- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly.
- have adequate safeguarding policies, procedures, and measures to protect people.
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority, and Charity Commission Regulatory framework.

This policy has been prepared to meet each school's safeguarding responsibilities under the following legislation:

- Care Act (2014)
- Charities Act 2011
- Children Act 1989; 2004
- Children and Social Work Act 2017
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
- Education and Skills Act 2008
- Equality
- Independent School Standards (ISI)
- Mental Capacity Act (2005)
- Multi-agency statutory guidance on female genital mutilation (2020)
- National minimum standards for boarding schools (DfE, September 2025)
- Public Sector Equality Duty (2012)
- Safeguarding Vulnerable Groups Act 2006
- Section 5B (11) of the Female Genital Mutilation Act (2003), as inserted by section 74 of the Serious Crime Act (2015)
- Statutory Framework for the Early Years Foundation Stage (DfE, September 2025)
- The Rehabilitation of Offenders Act (1974)

5.0 Roles and Responsibilities:

All staff must play an active role in safeguarding. Safeguarding-specific roles include Designated Safeguarding Leads (DSLs), Foundation Director of Safeguarding, Safeguarding Governors, and the Foundation Principal. There are clear reporting lines and protocols for concerns about staff, headteachers, governors, and the Foundation Principal.

All Foundation DSLs are members of the Senior Leadership Team of their respective schools. They will coordinate safeguarding and child protection arrangements, ensuring there are appropriate cover arrangements. DDSLs receive the same training (in line with Warwickshire County Council requirements) as DSLs and can cover if the DSL is absent.

The Designated Safeguarding Lead (DSL) and Deputies (DDSL)

The DSLs fulfil the same responsibilities at each of the schools. Each DSL is a senior member of staff from the school's leadership team and therefore has the appropriate status and authority within the school to carry out the duties of the post. The role of the DSL carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. This badge identifies the DSL at each school:

Safeguarding resources available to Foundation schools

All staff in each school use *MyConcern* as the means of reporting and recording concerns about children. Staff who do not have access to an electronic device use 'Green forms.'

Schools maintain close links with their local safeguarding partnership and make use of learning events and resources provided by Warwickshire Education Safeguarding.

6.0 The Management of Safeguarding.

The Foundation is committed to a whole-school approach to safeguarding, promotes an inclusive and anti-discriminatory culture as a core safeguarding responsibility with key aims to:

- Regularly update and review safeguarding policies
- Maintain effective training for all staff
- Implement strong filtering and monitoring systems to protect children online
- Ensure clear procedures for handling all allegations against staff, including low-level concerns
- Emphasise early intervention through a stepped approach to safeguarding and child protection and be alert to indicators such as repeated classroom removals, part-time

timetables, persistent absence or behavioural concerns, as these may signal safeguarding risks
- Ensure patterns of need are identified early and escalated appropriately through Early Support and safeguarding procedures and understand local Family Help pathways

DSLs, the Foundation Director of Safeguarding, and Safeguarding Governors review and approve this policy to ensure legal compliance. Foundation Heads and the Director of Safeguarding monitor policy effectiveness in partnership with the Governing Board.

If an allegation is made against a Foundation Head or the Director of Safeguarding, the Foundation Principal usually acts as case manager. If the allegation concerns the Principal, the Chair of Governors will assume this role.

All Governors are required to read *Keeping Children Safe in Education (KCSiE), Part1 and 2*, which outlines their safeguarding responsibilities. In addition, the lead safeguarding governors should familiarise yourselves with all of KCSIE.

Roles and Functions within the Foundation Schools

This policy applies to **all staff, volunteers, and governors** across Foundation Schools, including those involved in extended school and off-site activities, and aligns with the procedures of the Warwickshire Safeguarding Partnership: 🔗 https://www.safeguardingwarwickshire.co.uk/

Key Staff Responsibilities

All staff must read and understand **Part 1 of Keeping Children Safe in Education (KCSiE)** reviewed **annually**. This reinforces that safeguarding is everyone's responsibility and all staff must have a full understanding of key safeguarding principles and indicators.
All staff should exercise professional curiosity, meaning they should respectfully question, observe, explore and seek clarification where there are indicators that a child may be at risk of harm. Staff should not make assumptions based on a child's background, appearance, family circumstances, academic achievement or socio-economic status. Patterns of behaviour, changes in presentation, inconsistent explanations and cumulative concerns should always be explored and reported through safeguarding procedures.

All staff will:
- Attend annual safeguarding training at INSET
- Receive regular updates and briefings throughout the academic year
- Receive training on significant safeguarding themes such as signs of abuse, neglect, online safety, Prevent, exploitation, and radicalisation
- Understand their Filtering & Monitoring responsibilities (Section 30)
- Safeguarding updates relevant to EYFS are shared with relevant staff

Annually, staff receive and confirm understanding of the following policies:

- Foundation Safeguarding and Child Protection Policy (this Policy)

- Foundation Code of Conduct
- Child Behaviour Policy
- Foundation Staff Acceptable Use Policy
- Foundation Whistleblowing Policy

Policies are distributed via the Foundation's online portal (VWV), with paper copies available on request. Support is offered to staff with EAL or SEND.

Induction & Training

New staff clarify safeguarding systems with the DSL, DDSL, or Foundation Director of Safeguarding, usually within the first couple of weeks of starting. Staff in one-to-one roles, e.g., visiting music teachers, tuition, sports) must follow extra safety protocols.

In addition, DSLs and DDSLs:

- Undertake formal face-to-face training every 2 years
- Receive annual updates (e.g., meetings, bulletins)
- Receive regular supervision for support and development

Governors:

- Must regularly update safeguarding knowledge
- Understand local and contextual safeguarding risks
- Must challenge leaders and triangulate their assurances
- Safeguarding Governor attends DSL training every 2 years

Supply staff, contractors, trainee teachers and volunteers receive appropriate safeguarding briefings and the on-site leaflet, which includes DSL and safeguarding info.

For Parents

- If concerned that a child is in **immediate danger**, parents should:
  - Call **999**
  - Contact the relevant **DSL**
  - Or call **Family Connect (Warwickshire)**:
    📞 *01926 414144*

7.0 Safer Recruitment

The Foundation aims to employ only suitable staff and volunteers to work with children by following the requirements of KCSIE and the Foundation's Recruitment and Selection Policy. This includes complying with the Warwickshire Education Safeguarding Safer Recruitment process and the Independent Schools' Regulatory Requirements. The schools adhere to safe recruitment procedures, including those mandated by the Disqualification under the Childcare Act 2018.

At least one person involved in interviewing candidates for school positions must have completed Safer Recruitment training. This training covers the contents of KCSIE and aligns with local safeguarding procedures. Most senior leadership, management, HR staff, and

Directors within Professional Services are Safer Recruitment trained and are committed to updating their skills every three years.

All volunteers who engage in regulated activity with children will be subject to an enhanced DBS check with children's barred list information. Where volunteers are not engaged in regulated activity, risk assessments and appropriate supervision arrangements will be implemented. The Foundation will determine whether a role constitutes regulated activity in accordance with statutory guidance.

Schools that have EYFS provision must not allow an individual to begin working or volunteering at a setting until the provider has received both the barred list check and an enhanced DBS check.

Single Central Register (SCR)

The SCR will be overseen and directly managed by HR and the Head of the school, with the support of the DSL, who is responsible for safeguarding the school. HR is responsible for maintaining the information on a single central record. Audits will be conducted at least termly, by the Head and HR and overseen by the Safeguarding Governor. The details of an individual are removed from the SCR once they no longer work for the school. For further information about Safer Recruitment and DBS checks, please refer to Appendix 12, KCSIE, Part 3 and Safer Recruitment training resources.

8.0 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership/management team. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, each School Duty Team (which includes DDSLs/Pastoral Leads) and/or Foundation Director of Safeguarding can act as a cover including out-of-hours and out-of-term activities. To ensure continuity of safeguarding responsibilities, robust cover arrangements must be in place for periods when the DSL is unavailable due to illness, leave, or other circumstances. Cover rotas are in place for out of hours and holiday cover.

The DSL will be given the time, funding**,** training, resources, and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Report to Safeguarding Governors termly on the standard report template.

The DSL will also liaise with local authorities, such as Children's Services and the Designated Officer (LADO), through liaison with their Head, for child protection concerns as appropriate. The full responsibilities of the DSL and deputies are set out in their job descriptions. For further information on the role of the DSL, see KCSiE, Annex C and Appendix 2.

The Head of each School:

- Will ensure that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood and followed by all staff.
- allocates sufficient time, training, support, and resources, including cover arrangements, when necessary, to enable the *DSL and DDSL(s)* to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings
- supports the designated teacher for Children in Care (CiC) to promote the educational achievement of any children who are children in the care of the Local Authority and who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales
- ensures that all staff have the skills, knowledge, and understanding necessary for keeping children in care and children previously in care safe
- ensures that all staff feel able and are encouraged to raise concerns about poor or unsafe practices and that such concerns are handled sensitively and by the whistleblowing procedures
- ensures that the culture of the school supports the provision of effective pastoral care and initial help
- ensures that staff do everything they can to support Social Workers when Children's Social Care becomes involved as children who currently have or have had a social worker may be considered to be a distinct vulnerability group
- ensures that children are provided with opportunities throughout the curriculum to learn about safeguarding, including always keeping themselves safe including online as part of a broad and balanced curriculum.
- manages allegations and/or low-level concerns regarding staff and more serious allegations that meet the Local Authority Designated Officer (LADO) threshold, with the support of the Foundation Director of Safeguarding
- appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made
- refers to all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the LADO at the Local Authority within one working day before any internal investigation
- manages non-recent allegations of abuse regarding current and former members of staff

- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service promptly, as advised by the LADO
- refers any member of staff who has been dismissed (or would have been dismissed if they had not resigned), and where a prohibition order may be appropriate, to the Teaching Regulation Agency (TRA) and Disclosure and Barring Service (DBS) with the support of HR.

9.0 The Four Categories of Abuse

Neglect is the ongoing failure to meet a child's basic physical or emotional needs, potentially causing serious harm to their health or development. A child having a repeated medical condition could be an indicator of abuse or neglect (i.e. a child repeatedly sent to school without essential medication) DSL should be aware of any concerns and consider whether a medical incident might be indicative of wider neglect or abuse to make a referral.
Abuse and neglect often overlap and may include exploitation.

Types of abuse include:

Physical abuse: Causing physical harm through actions like hitting, burning, or poisoning, or by fabricating or inducing illness.

Emotional abuse: Persistent emotional maltreatment that harms a child's emotional development, including persistent criticism, belittling and name-calling, ignoring, isolating, or exposing the child to violence or serious bullying.

Sexual abuse: Forcing, causing or enticing a child to take part in sexual activities, whether physical (e.g., assault or inappropriate touching) or non-physical (e.g., exposure to sexual content or grooming). It can be perpetrated by adults or other children.

Under forthcoming legislation (expected May 2027), all individuals working with children have a legal duty to report concerns of **child sexual abuse.** A report must be made as soon as practicable where:

- A child discloses abuse
- Abuse is witnessed or overheard
- There is evidence of abuse (including images, video, or audio)

Reporting is now a legal obligation, and failure to report may result in legal consequences. It is also a criminal offence to prevent or discourage someone from making a report.

All concerns must be acted upon. There is no discretion to delay or take a wait and see approach.

Concerns should normally be reported to the DSL for onward referral to police or children's services. However, individuals retain personal responsibility and must report directly to external agencies if:

- There is immediate risk, or
- They believe appropriate action has not been taken

Only one report per incident is required, but all staff are responsible for ensuring that a report has been made.

This duty reinforces the need for:

- Immediate action
- Clear accountability
- Confidence to speak up and escalate concerns where necessary

Neglect: Failing to provide essentials like food, shelter, safety, supervision, medical care, or emotional support. This can start during pregnancy and continue after birth.

Staff should be alert to all forms of abuse, including exploitation, when making referrals to children's social care.

Recognising and Responding to Abuse

This approach ensures proactive safeguarding, timely intervention, and appropriate use of support services.

- All staff must be trained to identify signs of abuse or neglect and not rely solely on disclosures from children
- Every adult in school is seen as a *Trusted Adult*, emotionally available, and responsible for responding to harmful behaviours or disclosures
- Concerns and disclosures must be recorded promptly and securely using the school's safeguarding system, *MyConcern*. In serious cases, an immediate verbal alert to the DSL is required
- The DSL reviews and manages all safeguarding concerns using *MyConcern* and triages cases based on support needs
- The DSL typically decides on further actions, including referrals to Family Connect Warwickshire, following the Spectrum of Support guidance. If the DSL is unavailable, staff can contact Family Connect directly but must inform the DSL afterward.
- Safeguarding concerns may also arise where children display abusive, violent or controlling behaviour towards parents, carers, siblings or other family members. This is sometimes referred to as child-to-parent or child-to-carer abuse. Such behaviours should be considered within safeguarding assessments and discussed with the DSL.

Responding to Early Concerns About a Child's Welfare

- Staff may suspect a child is at risk even without clear evidence, changes in behaviour, unusual artwork, or writing may indicate distress
- Staff are encouraged to gently check in with children using open, non-leading questions, offering emotional support, and a chance to talk.

- Observed signs could relate to various life events (e.g., family changes, illness, or loss), not necessarily abuse.
- All early concerns should be documented using *MyConcern* or a Green Form.
- If concerns persist after speaking with the child, staff must consult with the DSL for further guidance and action.

Concerns that do not meet the threshold for child protection intervention will be managed through the **Early Support** process. See https://www.warwickshire.gov.uk/children-families/early-help-warwickshire for guidance and support.

Spectrum Of Support

All staff should possess a working knowledge of the local guidance, Warwickshire's Families First Spectrum of Support to ensure children and their families receive the right support, from the right person at the right time. Reference to this guidance will inform the identification of risk and harm. It represents a continuum of need and illustrates how Warwickshire responds to the needs of children, young people and families across the areas of support, Universal Help, Early Support, and Family Help.

For a comprehensive explanation of Warwickshire's Spectrum of Support, see: https://api.warwickshire.gov.uk/documents/WCCC-1642278725-4997

Universal Help

Children and young people have needs that are met within universal provision (such as through their GP or school). All children and young people have a right to universal services, such as maternity services at birth, health visits, schools, and health providers.

Early Support

Early Support is the help offered to potentially vulnerable children, young people, and their families.

The purpose of Early Support is to provide the right support at the right time so that problems are less likely to escalate to a point where the child becomes vulnerable or in need. Early Support is sustainable so that problems are less likely to re-occur.

Early Support does not always mean early years. While research does show that most impact can be made in those crucial first few years of a child's life, Early Support can be needed and put in place at any time and any age.

All school staff must understand the Early Support Assessment Tool and report concerns to the DSL using approved channels (*MyConcern* or green form). The DSL may delegate tasks but retains overall responsibility. Staff should follow safeguarding procedures and seek guidance when concerned about a child's wellbeing, assessing harm by balancing risks and

protective factors. Accurate, factual, information is essential. All staff must complete safeguarding and Early Support training to recognise when further action or advice is needed.

Family Help

Provides local, multi-disciplinary support tailored to children and families' needs. Professionals from various services may lead, combining early help and Section 17 support (Children in Need).

Immediate Protection

Led by Children's Social Care and/or Police when there is a risk of significant harm. A multi-agency child protection response is initiated.

Role of the DSL

The Designated Safeguarding Lead (DSL) typically has the full safeguarding picture and should respond to concerns, contacting Family Connect or Police when necessary. Children and parents are informed of referrals unless this increases risk or causes harmful delays.

Referral Process:

Any staff member can contact Family Connect or the Police directly if:

- It's an emergency, and no senior safeguarding staff are available
- They believe direct action is necessary for the child's safety Staff should inform the DSL/Head later, unless doing so increases risk

- **Family Connect (Mon–Thurs, 8:30am–5:30pm / Fri, 8:30am–5:00pm):**
  📞 *01926 414144*
- **Out of Hours Emergency Duty Team:**
  📞 *01926 886922*
- **Urgent Safeguarding Email (if phone unavailable):**
  📧 *TriageHub@Warwickshire.gov.uk*
- **Immediate Risk – Contact Police:**
  📞 *999*
- **Open case**: Contact the allocated social worker directly
- **Non-Warwickshire cases**: Use relevant local authority forms and contacts

Children's Social Care Response (within one working day):

They will decide whether:

- Immediate protection is required
- A Section 17 (Child in Need) or Section 47 (Significant Harm) assessment is needed

Follow-Up & Support

The school will follow up if no outcome is received or if the child's situation does not improve, and can use the Warwickshire escalation procedure. Staff will provide full support for any statutory assessments led by the DSL.

10.0 Child on Child Abuse: Allegations of abuse made against other pupils

The Foundation recognises that child-on-child abuse is a safeguarding concern for both the child who has experienced harm and the child displaying the harmful behaviour. While the needs of the victim will always be given careful consideration, the school also recognises that children who display harmful behaviour may themselves have experienced abuse, trauma, exploitation, neglect or adverse experiences and may require safeguarding assessment, support and intervention.

There is an increased focus on preventing child-on-child abuse, particularly sexual harassment and sexual violence. The Foundation recognises misogyny as a potential underlying driver of harmful sexual behaviours. It is increasingly shaped by harmful online content, where young people may be exposed to degrading narratives that normalise sexist attitudes and behaviours. Staff must be alert to early indicators, including pupils repeating extreme online content, language or behaviours, or demonstrating desensitisation to gender-based harm. These behaviours should be recorded and responded to as part of the school's safeguarding procedures.

The Foundation believes that child-on-child abuse is preventable. Through effective safeguarding systems, high-quality pastoral care, early identification of concerns, evidence-informed interventions and a whole-school culture that challenges harmful behaviours, schools can reduce risks and prevent escalation into more serious abuse or violence. Schools will adopt a proactive and preventative approach to child-on-child abuse, ensuring that behaviours are not dismissed as banter and that systems are in place to identify patterns early. Schools also recognise the gendered nature of child-on-child abuse, that it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Violence against women and girls (VAWG) is a safeguarding priority. This includes behaviours such as sexual harassment, sexual violence, misogyny, coercive behaviours and harmful sexual attitudes. Schools recognise that harmful attitudes towards women and girls may contribute to sexual harassment, sexual violence, abusive relationships and other forms of gender-based harm and will take a whole-school approach to preventing child on child, harmful sexual behaviour and VAWG, including through curriculum, staff training, strong safeguarding systems, and a culture where inappropriate behaviours are challenged and addressed consistently.

Upskirting is a criminal offence and must always be treated as such. Any incidents must be managed in line with safeguarding and, where appropriate, criminal procedures.

Most cases of pupils hurting other pupils will be dealt with under the school's behaviour policy, but the Foundation safeguarding and child protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is a serious, and potentially criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting, or sexually inappropriate pictures or videos (including the sharing of intimate images or semi-nudes, including pseudo-images, which are computer generated images)

Sharing of making or sharing nudes and semi-nudes and a definition covering photographs, videos, livestreams, digitally altered images, deepfakes and wholly AI-generated images. References now explicitly include AI-generated content, including deepfake imagery and self-generated intimate images. Staff must recognise the safeguarding risks associated with emerging technologies and respond in line with safeguarding and child protection procedures. Our approach is based on guidance from the UK Council for Child Internet Safety (https://www.gov.uk/government/organisations/uk-council-for-internet-safety)

Procedures for dealing with allegations of child-on-child abuse

All our schools have systems in place for children to confidentially report abuse. If a pupil makes an allegation of abuse against another pupil: the allegation must be recorded on *MyConcern* and inform the DSL, but do not investigate it.

The DSL will contact the local authority's children's services and follow its advice and the police if the allegation involves a potential criminal offence.

Creating a supportive environment in school and minimising the risk of child-on-child abuse. Staff must report all their concerns, however minor or insignificant they may think they are; they do not need 'absolute proof' that the child is at risk. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

11.0 Impact of abuse

Emotional and Long-term Effects:

Child abuse, neglect, and exploitation can leave lasting emotional scars. While many children recover and lead productive lives, some experience ongoing issues, including:

- Anxiety, depression, and other mental health difficulties
- Self-harm, eating disorders, substance misuse
- Unequal and destructive relationships
- Unfulfilled potential and long-term physical health problems

Proactive Measures:

Minimise the risk of child-on-child abuse and foster a supportive reporting environment. Action Plan:

- Challenge derogatory or inappropriate behaviour, including sexualised language and requests for sexual images.
- Be vigilant about gender-specific issues, such as aggressive touching or hazing
- Educate pupils on appropriate behaviour and consent
- Ensure easy and confident reporting of abuse
- Reassure victims they are taken seriously

Staff Training:

Recognise signs of child-on-child abuse and respond to reports. Understand that not all who have been abused identify as victims.

- Maintain an attitude that abuse could happen here, even if not reported.
- Act immediately on any concerns about a child's welfare.
- Complete a record of concern using *Myconcern* or a green form
- Be aware of additional barriers for vulnerable children
- Recognise that a child harming another may indicate they are being abused
- Understand their role in preventing and responding to child-on-child abuse
- Consult the DSL with any concerns and seek support if distressed

12.0 Handling Child Disclosures

Disclosure of abuse or exploitation by a child is difficult owing to shame, fear, and mistrust**.** Staff must inform the child that disclosed information will be shared. Children are taught about safe and unsafe secrets and the limits of confidentiality. Avoid investigative questions; only ask for necessary clarifications. Inform the child that they will be contacted, if possible, by a staff member or DSL before the day's end. Verbally report the disclosure to the DSL or Head if the allegation is against a staff member. Document the conversation promptly and submit it to the DSL or Head. Reassure the child that they are taken seriously, will be supported, and should not feel ashamed for reporting.

Victim Wishes:

Consider the young person's preferences for proceeding with investigations, balancing with the school's duty to protect others. Factors include:

- Nature and context of the incident(s)
- Ages and developmental stages of involved children
- Power imbalances
- Patterns of abuse
- Relationships between peers
- Ongoing risks
- Related issues such as child sexual and criminal exploitation

Notifying parents

The schools will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion, or disclosure. Our focus is the safety and well-being of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice may be sought first from Children's Social Care, Family Connect in Warwickshire.

The school can make a referral without having parental consent

Any member of staff or parent can make a direct referral themselves, but the DSL usually has the most complete picture of the circumstances, so should be consulted if possible.

13.0 Preventing Radicalisation

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Extremism opposes fundamental British values like democracy, the rule of law, individual liberty, and tolerance. It includes advocating for violence against the armed forces.

Terrorism involves actions that harm people, damage property, or disrupt systems, intended to influence government or intimidate the public for political, religious, or ideological reasons. Schools must prevent children from becoming involved with or supporting terrorism. Each DSL and all staff will undergo Prevent training every two years and ensure staff are trained to identify at-risk children. Schools will assess local terrorism risks with safeguarding partners and police. Staff should refer to the DfE's guidance: https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting. The Foundation Prevent Risk Assessment is maintained by the Director of Safeguarding (DOS) and the Foundation's DSLs and is regularly reviewed by the Safeguarding Governors to ensure continued safety and compliance with relevant statutory requirements.

The Foundation implements appropriate internet filtering and monitoring to ensure pupils' online safety. There is no single way to identify someone susceptible to radicalisation into terrorism. Radicalisation can happen quickly or slowly. Staff should watch for behavioural changes in pupils. The *EducateAgainstHate* website provides resources for identifying radicalisation signs.

Protecting children from radicalisation and extremism

- Under Section 26 of the Counter Terrorism and Security Act (2015), schools must prevent children from being from becoming involved with or supporting terrorism, known as the Prevent Duty.
- Schools should address ideological causes of terrorism by building resilience through the curriculum and implementing IT and speaker policies to reduce exposure to radicalising influences.

- Protecting children from radicalisation is part of broader safeguarding duties, similar to protecting them from other harms. The DSL oversees the strategy for this protection.
- Extremism can affect even young children, including exposure at home and online.

Radicalisation

Schools have defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school. If staff believe someone is in danger of being exploited or becoming radicalised, use the school's safeguarding and duty of care procedures in the first instance to raise concerns. Police or Channel can then become involved if necessary.

Anyone can call the national police **Prevent advice line on 0800 011 3764**, in confidence, to share their concerns with specially trained officers. The advice line is open from 9 am to 5 pm every day. Anyone can also contact the Warwickshire Prevent team by emailing Warwickshire Prevent Officer, Hema Nolan, hemanolan@warwickshire.gov.uk 01926 412432

14.0 Managing Allegations - Abuse of Position of Trust

Staff must always maintain professional and appropriate behaviour towards children. Under the Sexual Offences Act 2003, it is a criminal offence for staff to engage in sexual relationships with anyone under 18 in their care, even if the person is over the age of consent (16), as they are in a position of trust.

If police do not act, cases are managed through the Foundation's disciplinary procedures and could result in dismissal. Allegations against former staff are referred to the police, with full cooperation from the Foundation. All staff must read and acknowledge the Staff Code of Conduct at the start of and throughout their employment.

Allegation

Safeguarding vigilance continues beyond recruitment. Schools must maintain clear systems for identifying, recording, and responding to both low-level concerns and allegations that meet the harm threshold. An allegation meets the 'harm' threshold if a staff member, volunteer, or contractor:

- Has harmed or may harm a child.
- May have committed a criminal offence against or related to a child
- Behaved in a way that indicates they may pose a risk to children
- Behaved in a way that suggests they may be unsuitable to work with children

Such behaviour indicates risk if the person continues to work with children. Staff can report suspected abuse or neglect directly to the Police if necessary for child safety. Staff can contact the Warwickshire LADO (01926 745376) to coordinate responses to allegations against individuals working with children. Contact details are displayed on safeguarding noticeboards.

Staff can use the NSPCC whistleblowing helpline (0800 028 0285) if they feel unable to raise concerns internally. The helpline operates Monday to Friday, 8:00 am to 8:00 pm, or via email at help@nspcc.org.uk. Contact information is available on the NSPCC website and displayed in staff rooms. For further information: See Appendix 6

15.0 Children who may be particularly susceptible

Certain children are more vulnerable to abuse and neglect due to factors like social exclusion, prejudice, communication difficulties, and specific personal or family circumstances. Risky behaviours such as drug use, truancy, sexting, and child-on-child (e.g. bullying, sexual harassment, or gender-based violence) increase safeguarding concerns.

Particularly vulnerable groups include:

- Children with (or have had) a Social Worker
- Children with Special Educational Needs and Disabilities (SEND)
- Children that are electively home educated (EHE)
- Children with mental health needs
- Those facing communication barriers
- Children involved in risky behaviours

Children with a Social Worker

Children who have a social worker, including those subject to Child in Need plans, Child Protection plans, Family Support arrangements or who have previously had a social worker, are recognised as potentially being at greater risk of harm, poorer educational outcomes and safeguarding vulnerabilities. Staff should be aware of these additional risks and ensure information is shared appropriately with the DSL.

Children with Special Educational Needs and Disabilities (SEND) may face safeguarding challenges. They are more likely to experience abuse or neglect and may have difficulty recognising, reporting, or communicating concerns. Their behaviour may be misinterpreted, and they may be more vulnerable to isolation, bullying, and exploitation, particularly online. Communication barriers may reduce cognitive understanding, and challenges with emotional regulation can sometimes mask safeguarding indicators.

Children with SEND may face additional safeguarding challenges due to:

- Misinterpretation of their behaviour
- Increased risk of isolation and bullying
- Communication and cognitive difficulties
- Challenges understanding online content

Staff, especially the DSL and SENCO, work closely to identify risks, provide appropriate support, and ensure safeguarding measures are accessible and inclusive. Staff receive training to recognise and respond to these barriers. Safeguarding information is made accessible to children and families with communication needs or disabilities.

Children that are EHE

Children who are electively home educated can be vulnerable to abuse, neglect, exploitation, social isolation and reduced access to protective professional support.

Where a child leaves a school roll for elective home education, safeguarding concerns and relevant information will be shared with the Local Authority in accordance with statutory requirements. Staff should remain alert to any safeguarding concerns where elective home education appears to be linked to unmet needs, attendance concerns, off-rolling, exploitation, domestic abuse, radicalisation or other safeguarding risks.

Safeguarding and Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health concerns can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other adverse childhood experiences.
Staff are not expected to diagnose mental health conditions; however, they are well placed to observe changes in behaviour, emotional wellbeing, attendance, presentation and engagement.

Where mental health concerns give rise to safeguarding concerns, staff must follow safeguarding procedures, and report concerns to the DSL.

A whole-school approach is adopted to promote emotional wellbeing through prevention, early intervention, pastoral support, education and, where appropriate, referral to specialist services e.g. RISE/CAMHS.

Where there is immediate concern that a child presents a risk to themselves or others, emergency services should be contacted via 999 and urgent medical assistance sought through Accident and Emergency services. Where support is urgently required but the situation is not an emergency, staff and families may be signposted to NHS 111 and the Mental Health Crisis Support option. All such incidents should be reported to the DSL without delay.

School Responsibilities

- Staff should be alert to mental health concerns as possible safeguarding issues.
- Risk behaviours such as drug use, alcohol abuse, truancy, and sexting increase vulnerability. Severe absence can also signify safeguarding implications.
- Child-on-child abuse can include:
    - Bullying (including cyberbullying)
    - Gender-based violence or sexual assaults
    - Teenage relationship abuse
    - Upskirting and sexual harassment
    - Hazing rituals
    - Youth-produced sexual imagery

Safeguarding information should be accessible to all families, including in community languages and alternative formats for those with communication needs.

Mental Health Support in Schools

A whole-school approach to emotional well-being includes:

- **Preventative education** through PSHEE and pastoral care
- **Early interventions** such as:
  - Monitoring student well-being
  - Signposting to self-help resources
  - Support from pastoral staff, school nurse, or counsellor
- **Higher-level interventions**, including:
  - School-based counselling
  - Referrals to external services like CAMHS (RISE)
  - Support from the Mental Health Lead, SENCO, or Head of Learning Support

Key Support and Resources for Children who may be particularly susceptible

- SEND Code of Practice: 0 to 25 years
- Supporting Pupils at School with Medical Conditions
- Mental Health and Behaviour in Schools (2018)
- Promoting Children and Young People's Emotional Health and Wellbeing
- RISE (CAMHS) Navigation Hub Referral Info
- Find your local SENDIASS service: https://councilfordisabledchildren.org.uk/
- Mencap – Learning Disabilities Advice and Support
- Promoting Children and Young People's Emotional Health and Well-being
- RISE (CAMHS) School Referral Form
- RISE Navigation Hub: 0300 200 2021 (Monday to Friday, 8am–6pm)

16.0 Self Harm

Self-harm is any act of intentional self-injury or self-poisoning. Examples include:

- Self-cutting
- Taking an overdose
- Swallowing objects or poisons
- Hitting or bruising
- Self-strangulation with ligatures
- Burning

Self-harm is common in adolescents: approx. 32% report having self-harmed at some point (youngminds). It is more common in females than males, especially in early adolescence. Self-harm is much less frequent in younger children, but under the age of 11, self-harm is more common in boys than in girls. Self-harm may present somewhat differently in this age group; for example, scratching, picking scabs, head-banging, and other forms of self-injury or reckless behaviour.

Finding out about self-harm

Young people often hide their self-harm, but there are many signs that they may be self-harming. These include:

- Unexplained cuts, burns or bruises
- Keeping themselves covered; avoiding swimming or changing clothes around others
- Signs of self-harm may be similar to signs of physical or other abuse. For example, cigarette burns or bruises could be inflicted by the young person or by someone else, so it may be hard to know the reason behind a given sign
- Other non-specific signs of self-harm (which may also relate to other mental health problems) include:
    - Becoming withdrawn or isolated
    - Low mood; lack of interest in usual activities; lowering of academic grades
    - Sudden changes in behaviour e.g. becoming irritable, angry, or aggressive
    - Excessive self-blame for problems, expressing feelings of failure, uselessness, or hopelessness

For support if you notice a child has self-harmed or a self-harmed at school, refer to the flowchart in Appendix 7.

17.0 Attendance

The Foundation recognises that attendance, safeguarding and wellbeing are intrinsically linked. Persistent absence (attendance below 90%) and severe absence may be indicators of unmet need, abuse, neglect, exploitation, mental health difficulties, special educational needs and disabilities (SEND), or other safeguarding concerns.

There is an increased expectation for the early identification of unmet needs. Schools must be alert to indicators such as part-time timetables, repeated removals from lessons, persistent absence, severe absence, or behavioural concerns, as these may indicate safeguarding risks. Such indicators may be associated with unmet need, exploitation, abuse, neglect, mental health difficulties or child-on-child abuse and should always be considered within safeguarding processes.

Our schools will work proactively with pupils, families, local authorities and partner agencies to identify and remove barriers to attendance at the earliest opportunity. Particular attention will be given to children who are vulnerable, including those with a social worker, pupils with SEND, young carers, children experiencing mental or physical ill health, and those at risk of becoming persistently or severely absent.

Attendance concerns will be considered as part of our wider safeguarding arrangements and may result in Early Support, multi-agency intervention, or a safeguarding referral where appropriate. Attendance information will be regularly reviewed to identify emerging risks, patterns and trends, ensuring that children receive the right support at the right time.

18.0 Children who are absent from Education

All children are legally entitled to a suitable full-time education. Regular school attendance is crucial for safeguarding, as children who are absent from Education or with persistent

unexplained absences are more vulnerable to risks such as neglect, abuse, exploitation, radicalisation, and mental health issues. Staff should be alert to warning signs, including prolonged or repeated absences, as they may indicate serious safeguarding concerns like criminal or sexual exploitation, especially county lines. Absence patterns can also highlight risks for children already known to social services. Schools play a key role in identifying and responding to these issues early to prevent further harm.

The Foundation operates following DfE statutory guidance, Children Missing Education (2025) (for further information, see Appendix 8.)

19.0 Helping Children Understand and Recognise Risk and Identify Available Support

Schools must educate all pupils, especially vulnerable children, abuse victims, and those with SEND, on safeguarding, including online safety, as part of a comprehensive and needs-based curriculum.

Through PSHEE, sex and relationships education, and wider school activities, children are taught to recognise, manage, and seek help regarding risks, which promotes responsible behaviour.

Regular lessons address the risks associated with online content sharing and cyberbullying, encouraging pupils to raise concerns with staff.

Children learn about the legal and emotional risks of sharing indecent images, even in consensual or experimental contexts. Staff are trained to identify and report concerns. Staff will speak with children and usually inform parents unless doing so increases risk. Children under 13 cannot legally consent to sexual activity; such cases are referred to the police.

Personal Safety Programmes:

- Warwick Prep and Warwick Junior use the 'Taking Care' programme
- Kingsley Prep and Senior Schools implement Protective Behaviours to develop safety awareness and resilience

Health & Relationships Education: Delivered usually using the Jigsaw Programme and/or PSHEE Association materials, covering:

- Consent
- Healthy relationships
- Exploitation
- Sexting/YPSI
- Bullying
- Substance misuse
- Gang activity
- Fundamental British values

The approach aims to equip children with the knowledge, confidence, and support to stay safe in all aspects of life.

20.0 Children who are lesbian, gay, bi, or gender questioning (LGBT+)

LGBT+ children can be targeted by peers, including those perceived as LGBT+. The risk increases if they lack a trusted adult to confide in. Staff should work to reduce these barriers and provide a safe space for LGBT+ pupils to share concerns.

It's also important for staff to create a culture where pupils can speak out or share any concerns with staff. Children are encouraged to speak to pastoral staff or trusted adults, who should relay relevant safeguarding information to the DSL/DDSL overseeing inclusion. Staff can also seek advice on supporting LGBT+ students. LGBT+ inclusion is part of the statutory education curriculum, and resources are available to combat homophobic, biphobic, and transphobic bullying, with contact information provided for pupil support.

KCSIE states staff must take a cautious and evidence-informed approach when supporting gender-questioning pupils. Decisions should be based on appropriate safeguarding risk assessments, involve parents where appropriate, and consider legal duties, including those relating to single-sex spaces and equality law. The welfare of the child remains paramount. Decisions relating to social transition must be carefully documented, with clear records maintained outlining the rationale for decisions and any safeguarding considerations.

21.0 Staff reporting safeguarding concerns, including both low-level concerns and allegations, about a colleague, themselves, or another adult who works with children (including whistleblowing)

The Foundation Governing Body ensures ongoing vigilance to prevent abuse and address inappropriate behaviour by promoting a culture of openness, trust, and transparency, guided by clear values and expectations outlined in Foundation Staff Code of Conduct Policy which staff can access in the HR and Staff Policies section of Our Foundation Hub (based on *Guidance for safer working practice for those working with children and young people in education settings* (May 2019).

All staff must understand procedures for reporting behaviour/conduct, and safeguarding concerns about colleagues and prioritising child welfare. This applies to everyone working in or for Foundation Schools, including paid, unpaid, permanent, and temporary staff. Staff must report any concerns about inappropriate behaviour, conduct or concerns relating to a staff member and a child as soon as possible to maintain a safe environment. Reports can initially be made in confidence to the Head/Bursar/Director of Safeguarding.

Concerns may relate to an adult's behaviour outside of work and can arise from various sources, including suspicions, complaints, disclosures, or vetting checks. Examples include arrests for possession of a weapon or close associations with individuals posing risks to children. Concerns reported to the school can relate to an adult's relationships with others if

they have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child.

A 'low-level' concern, though seemingly minor, involves any behaviour inconsistent with the Foundation Staff Code of Conduct but not severe enough for a referral to the Local Authority Designated Officer (LADO), however several lower-level concerns or a displaying pattern of behaviour by a staff member may be referred to LADO for advice to see whether collective concerns meets the LADO threshold.

Such concerns include being overly friendly with children, having favourites, engaging privately with a child, humiliating a child, or using inappropriate language. These should be reported using the yellow form online system.

Staff are not expected to determine whether a concern qualifies as a low-level concern or meets the threshold for an allegation. Their responsibility is simply to report any matter they believe may be a concern. It is then the role of the appropriate Head, Bursar, Director of Safeguarding, or Governor to assess the situation and decide whether it meets the harm threshold and is addressed as either a low-level concern or an allegation. This section of the policy should be read in conjunction with the current statutory guidance KCSIE Part 4, Section 2.

22.0 Site Security

We take the safety and well-being of pupils, staff, and visitors seriously, and aim to keep our school environment secure and welcoming. Sensible site security measures help us manage access, reduce risks, and make sure everyone feels safe while at school.

- Visitors are required to sign in at Reception, wear identification badges, and be escorted where necessary
- CCTV is in operation in key areas to support safety and deter unauthorised access, in line with GDPR and data protection policies
- All visitors must report to Reception on arrival, sign in using the school system, and always wear a visible visitor lanyard
- Visitors without a valid DBS clearance will be accompanied by a member of staff while on site
- Staff are trained to challenge anyone not wearing a school ID badge or visitor lanyard
- All staff must wear ID badges during school hours.
- Deliveries are accepted at designated times and locations to minimise disruption and avoid unnecessary access to pupil areas
- Contractors working on site during the school day must have appropriate safeguarding checks or be supervised in line with the school's safeguarding protocol
- All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe
- Fencing, gates, and other physical barriers are regularly inspected any damage, or security breaches must be reported immediately to the Director of Facilities and/or Facilities Site Manager, Health and Safety Manager, and/or DSL
- Lockdown, fire, and evacuation procedures are in place and practised regularly with staff and pupils
- All staff are aware of their responsibilities in the event of an emergency and receive annual training

- The Foundation prohibits the presence of banned dog breeds on-site at all times, including during visits or non-school activities (EYFS Statutory Framework 2026)

For further information, see the DfE guidance, *Protective security and preparedness for education settings* (April 2025)

23.0 Behaviour Management, Physical Contact, Reasonable Force and Restrictive Intervention

Each School's Child Behaviour Policy is set out in a separate document, reviewed regularly by the Governing Body, and shared with staff, parents and pupils. All staff are required to understand and follow the expectations, procedures and safeguarding responsibilities outlined within the policy. Behaviour management approaches will always seek to promote the welfare, dignity and best interests of children.

Physical Contact, Reasonable Force and Restrictive Intervention

The Foundation recognises that appropriate physical contact may, on occasion, be necessary to support, comfort, guide, reassure, protect or safeguard a pupil. Any physical contact must be appropriate to the age, needs and circumstances of the child and consistent with professional boundaries and the Staff Code of Conduct.

On rare occasions, staff may need to use reasonable force or restrictive physical intervention to prevent a pupil from causing harm to themselves or others, committing a criminal offence, damaging property, or seriously disrupting good order and discipline. Any intervention will only be used as a last resort, when no less restrictive alternative is available, and must be reasonable, necessary and proportionate to the level of risk presented. Restrictive intervention will be used for the shortest time necessary to reduce or remove the risk of harm.

The Foundation recognises that blanket 'no contact' approaches are not appropriate, as they may prevent staff from providing necessary care, support, protection and safeguarding to pupils. Staff are expected to always exercise professional judgement and act in the best interests of children.

Staff who may be required to use reasonable force or restrictive intervention will receive appropriate guidance and training.

All incidents involving restrictive physical intervention will be recorded, monitored and reviewed in accordance with the relevant procedures. Where necessary, parents/carers will be informed, and the wellbeing of all pupils involved will be considered following any incident. Behaviour management concerns that may indicate a safeguarding need, including repeated removals from lessons, significant behavioural changes, aggression, distress, emotional dysregulation, or patterns of restrictive intervention, will be considered through the Foundation's safeguarding procedures and shared with the DSL where appropriate.

This section should be read in conjunction with the Foundation Code of Conduct, Use of force and control to restrain pupils or Restrictive Interventions, including use of reasonable force, in school's policies, any guidance relating to reasonable force and restrictive physical intervention.

Within EYFS (WPS/ TKS), staff must have regard to statutory safer sleep guidance. Even where children do not normally sleep during the day, procedures must ensure that any child

requiring rest is adequately always supervised and remains within sight and hearing of staff to monitor their welfare.

24.0 Searching, Screening, and Confiscation

Individual school policies should be read in full before a search is considered. Due regard is given to the DfE guidance: Searching, Screening and Confiscation: advice for schools

If the member of staff considers a search to be necessary but is not required urgently, they will seek the advice of the headteacher, DSL, DDSL, or pastoral member of staff who may have more information about the pupil. The DSL should liaise with the head and members of staff authorised to search to inform them of issues, especially ongoing inquiries under section 47 of the Children Act 2004 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. During this time, the child will be supervised and kept away from other pupils. A member of staff's power to search outlined above does **not** enable them to conduct a strip search (removing more than the outer clothing), and strip searches on school premises shall only be carried out by police officers by the Police and Criminal Evidence Act 1984 (PACE) Code C.

Whilst the decision to carry out a strip search and the search itself are police matters; school staff still have a duty of care to any child involved and should always advocate for the child's wellbeing. School staff will always consider whether introducing the potential for a strip search through police involvement is necessary and should always ensure that all other appropriate, less invasive routes have been explored. An appropriate adult should be involved in all searches at school that involve police so that child wellbeing can be considered.

25.0 Record keeping, confidentiality, and information sharing

Staff and Governors should use the DfE's data protection guidance for schools to help comply with data protection law. They will:

- Develop data policies and processes
- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches (see Appendix 12 for Data Protection Act 2018 and further information on data protection)
- The schools will maintain safeguarding (including Early Support) and Child Protection records by the guidance document Child Protection Record Keeping Guidance (2020). Safeguarding records are part of a child's pupil record, and parents can request access, subject to GDPR to protect individuals from significant harm.

Staff use the MyConcern system to record observations, disclosures and safeguarding concerns. Where *MyConcern* is unavailable, concerns should be recorded using a Green Form. Visitors and contractors must use Green Forms, which will be uploaded to *MyConcern* by a trained member of staff.

Whilst an individual pupil concern may not appear significant in isolation, a series of low-level or seemingly minor concerns may collectively indicate a pattern of behaviour that requires

further assessment, intervention or referral. All concerns will therefore be recorded, reviewed and monitored by pastoral staff to identify emerging patterns and ensure an appropriate response.

When a pupil transfers to another school or educational setting, the DSL will ensure that any safeguarding and child protection records are transferred securely and separately from the main pupil file. Child protection information will be shared promptly to support continuity of safeguarding arrangements and ensure that children receive appropriate support without delay.

Our schools will ensure that:

- In-year safeguarding and child protection file transfers are completed within five working days
- Transfers taking place at the start of a new term are completed within five to ten working days
- All incoming safeguarding and child protection records are reviewed by the DSL, DDSLs and other relevant staff, as appropriate, when a child joins the school
- Safeguarding and child protection records are maintained separately from the pupil's main educational record and are accessible only to the DSL and those who need the information to fulfil their safeguarding responsibilities
- Receipt of transferred files is confirmed by the receiving DSL/DDSL
- Appropriate records are maintained regarding the transfer of information
- Information relating to other pupils is redacted where necessary

Where a child is subject to a Child Protection Plan, Child in Need Plan, Family Support arrangements or other multi-agency involvement, the DSL will consider whether safeguarding information should be shared in advance of transfer to support effective transition and continuity of care. The DSL will exercise professional judgement when sharing information and will do so in accordance with safeguarding, information-sharing and data protection requirements, ensuring that the welfare of the child remains paramount.

Confidentiality and information sharing

The schools will manage and share confidential information about children in line with Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents, and carers (2024). All staff will understand that safeguarding and child protection issues warrant high confidentiality, not only out of respect for the child, family, and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

When sharing safeguarding information, staff will consider:

- whether the information is relevant to the safeguarding risk or concern
- what information the recipient genuinely needs to know
- whether the information is presented clearly and with appropriate context
- whether the sharing is proportionate, necessary and focused on protecting the child

26.0 Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements.

Where extended school activities are provided by and managed by the school, the school's safeguarding and child protection policy and procedures apply. If other organisations provide services or activities on the school site, the school will check that those organisations have appropriate procedures in place. DSLs for Holiday Action and Swim School take responsibility for ensuring that robust procedures are in place to confirm attendance and swift reporting of non-attendance and children going missing from Holiday Action and Swim School at any time when they should be there. The DSLs for Holiday Action and Swim School will also ensure that effective quality assurance arrangements are in place to monitor the ongoing effectiveness of all safeguarding arrangements that the children's Holiday Action and Swim School provision have in place.

When school children attend off-site activities, including day and residential visits, volunteering, and work-related activities, the school will check that effective safeguarding, child protection, and whistleblowing arrangements are in place, and that necessary vetting has been undertaken, where appropriate.

27.0 Photography and images

Most people take or view photographs or videos of children for innocent reasons, but some misuse images, so schools implement safeguards. To protect pupils, staff will seek consent from children and parents, only take appropriate images, ensure children are dressed appropriately, and encourage children to voice concerns about images.

For publicity, schools will avoid naming children, when possible, use first names, if necessary, avoid using names and images together, determine retention and use duration, and store images securely. Only school-owned equipment will be used to record and store images taken by staff or volunteers.

Parents can photograph their children during school activities but must not photograph groups in EYFS or publish photos of other children. Staff, visitors, and volunteers cannot use personal devices or cameras to photograph EYFS children. For this reason, personal mobile phones or cameras (including Smart Glasses) are not to be used in the Prep School in areas where children may be present. Smart Watches must also be disabled/put into flight mode when working with EYFS children. Photos taken by staff using school equipment are for developmental records, password-protected and deleted from devices after printing.

Visiting practitioners must follow the same restrictions as staff and volunteers regarding recording and storing images of children. However, some professionals may record images of the premises for professional purposes and to support the school, e.g., professionals providing advice or preparing quotations for work such as maintenance, health, safety, and building.

28.0 Online Safety

Children frequently use devices and the internet for communication, learning, and entertainment, but these technologies also pose significant safeguarding risks. Children must be protected from harmful and inappropriate online material. A whole-school approach to online safety helps educate and protect pupils, and staff in their use of technology, while establishing systems to identify, respond to, and escalate concerns when needed. Online safety risks fall into four main categories:

Content – Exposure to illegal, inappropriate, or harmful material, such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories, AI-enabled grooming, chatbot manipulation, fraud, impersonation, misinformation and disinformation, not just deepfakes and intimate images.
Contact – Harmful online interactions with others, including peer pressure, commercial advertising, and adults posing as children or young people to groom or exploit them sexually, criminally, financially, or otherwise.
Conduct – Online behaviours that may cause harm or increase risk, such as making, sending, or receiving explicit images (including consensual and non-consensual sharing of intimate images, semi-nudes, or pornography), sharing explicit content, and online bullying.
Commerce – Online commercial risks include gambling, inappropriate advertising, phishing, and financial scams.

Foundation schools use filtered networks (e.g., Smoothwall) and manage device use through policies like BYOD guidelines and Acceptable Use Policies. They restrict access to inappropriate websites and prevent circumvention via hotspots or VPNs. Where filtering is not possible (e.g., 3/4/5G use), pastoral education on online safety is provided through PSHEE and assemblies.

Children are not allowed to access social networking sites in school, and staff are trained to report online risks as they would any safeguarding issue. Schools also work closely with parents to promote safe internet use at home, encouraging parental controls and regular communication about online activities and expectations. All online systems must comply with data protection and GDPR laws.

The following resources, plus many more listed in KCSiE Annex B may also help schools understand and teach about safeguarding:

- DfE advice for schools: *teaching online safety in schools*
- DfE guidance on *Generative artificial intelligence (AI) in education*
- IWF: Professional Guides: *Understanding and Responding to AI-Generated Child Sexual Abuse Material*
- UK Council for Internet Safety (UKCIS) guidance: *Education for a connected world*
- UKCIS guidance: *Sharing nudes and semi-nudes: advice for education settings working with children and young people*

- The UKCIS external visitors' guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: '*Thinkuknow'*
- UK Health Security Agency and the Office for Health Improvement and Disparities (OHID)
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers, and where to get help and support.

Using AI Safely and Effectively in Education

Staff should be aware that artificial intelligence may be used to:

- Create deepfake imagery or audio
- Impersonate trusted adults
- Generate harmful, extremist or misleading content
- Facilitate online grooming
- Manipulate vulnerable children through AI-powered chatbots
- Commit fraud, coercion or blackmail

The Foundation recognises that advances in artificial intelligence may increase safeguarding risks and therefore staff will remain vigilant and report concerns through safeguarding procedures.

The rapid development of artificial intelligence means that pupils (including those who have turned 18) may be exposed to or involved in the creation or distribution of synthetic or manipulated imagery. These incidents must be treated as safeguarding concerns.

All AI use should be carefully assessed for benefits and risks, with mitigation plans in place for unauthorised or harmful use (e.g. fake emails or fake image generation). All AI use should have a defined, beneficial purpose that justifies the risks. The Foundation can choose how to use AI, whether with staff only, for admin tasks, or in specific subjects or with specific age groups, with suitable safeguards. Pupils should only use AI tools under close supervision, with safety filters and monitoring systems in place.

The DfE has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Compliance and Safeguarding, the Foundation will:

- Follow the age restrictions of AI tools
- Integrate AI into online safety and safeguarding policies and staff and pupil acceptable use policies
- Consult the Keeping Children Safe in Education guidance (KCSiE)
- Refer to AI product safety expectations and filtering, and monitoring standards

- Ensure all AI use aligns with statutory responsibilities to protect students
- Ensure that appropriate Data protection measures and mitigations are in place

For further information, see Foundation Use of Artificial Intelligence (AI) Policy

29.0 Mobile Phones, Computers, and Tablets

The Foundation promotes a mobile phone-free environment where appropriate, recognising the safeguarding benefits of reducing access during the school day. Children's mobile phones should be switched off and put away during the school day or other school activities unless their use is directly supervised by a member of staff and for a specific purpose.

All staff in Foundation Prep Schools must not use their phones in areas where pupils are present. Pupils at both King's High and Warwick School store their phones in a lockable pouch which can be placed either in the child's school bag or their locker. Any use should be clearly defined exception. Further information can be found in each school's Mobile Phone Policy. For children in the EYFS, the Foundation has regard to screen use, ensuring that technology (such as iPads and interactive whiteboards) is used primarily to support educational learning and development rather than for passive consumption.

The rapid development of, and widespread access to, technology has provided a new medium for 'indirect' bullying, which can occur in or outside school: cyberbullying is a different form of bullying because it can happen at all times of the day and night, with a potentially bigger audience as people forward on content. More information on cyberbullying, including tips on dealing with it can be found at: https://www.bullying.co.uk/cyberbullying/what-is-cyberbullying/ Online bullying and sexting by children will be treated as seriously as any other type of bullying and will be managed through each School's anti-bullying procedures (see '*Youth produced sexual imagery* in Section 28 below). Serious incidents are managed in line with child protection procedures.

The Foundation Director of Digitally Enabled Learning meets with the coordinators from each school and DSLs, Foundation Director of Safeguarding and Safeguarding Governors to discuss digital learning (including AI), online safety and filtering, and each school's monitoring responsibilities.

30.0 Filtering and monitoring

To limit children's exposure to the above risks, governing bodies ensure the schools IT system has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure school leadership team's and relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified. Governing bodies should consider the age range of their children, how often they access the IT system, and the proportionality of costs versus safeguarding risks. The Foundation has a Filtering and Monitoring Policy that highlights an annual review of Filtering and Monitoring to identify any gaps in the current provision. Safeguarding Governors regularly meet with the Foundation Director of Digitally Enabled

Learning and Foundation Director of Safeguarding to check filtering and monitoring processes are in place, such as, reviewing reports, response and escalation of alerts, and discuss the annual review to assess their effectiveness. Filtering and Monitoring systems are reported termly at the Governors Safeguarding Committee.

The appropriateness of any filters and monitoring systems is a matter for individual schools and will be informed in part, by the risk assessment required by the **Prevent Duty**. To support schools and colleges in meeting this duty, the Department for Education has published filtering and monitoring standards https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provisions at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs. Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools in meeting these standards.

31.0 Bullying, child-on-child abuse, sexual harassment, and harmful sexual behaviour

The Foundation believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other students in the school. Incidents of bullying, child-on-child abuse, and harmful sexual behaviour will be treated in the same way, whether they occur on the Foundation site or beyond.

Children may be harmed by other children or young people. All staff recognise that children can abuse other children and are trained to understand and implement their school's policy and procedures regarding child-on-child abuse. They know it is important to challenge abusive behaviour between children/ young people and that any concerns must be reported to the DSL. All child-on-child abuse is unacceptable and will be taken seriously. Children are reminded regularly that there is always someone they can talk to about abusive behaviour from other children or young people and that they will be listened to, and their concerns will be taken seriously.

Bullying

Bullying is a serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in rare cases has been a feature in the suicide of some young people.

All incidents of bullying, including cyber-bullying and prejudice-based bullying must be reported and will be managed through each **School's Anti-bullying Policy,** which can be accessed on the school's website. All children and parents receive a copy of the procedures for joining the school and the subject of bullying is addressed at regular intervals in PSHEE education. All members of staff receive a copy of their **School's Child Behaviour Policy**, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and child-on-child abuse proactively.

Abuse is abuse and the Foundation adopts a zero-tolerance approach to abuse, it should never be tolerated, minimised, or dismissed as 'just banter,' 'just having a laugh,' 'just part of growing up' or 'boys being boys' or 'girls being girls' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example, girls being sexually touched/assaulted or boys being subject to initiation/hazing-type violence. Whilst mindful of the vulnerability of women and girls to violence, it is also recognised that boys, as well as girls, can be abused by members of the opposite as well as the same gender group. All child-on-child abuse is unacceptable and will be taken seriously.

We recognise that some students will sometimes negatively affect the learning and well-being of others and their behaviour will be dealt with under each School's Child Behaviour Policy. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

The Foundation recognises that its boarding pupils are unique in many ways and that one of these is that, unlike their day pupil counterparts, they may not be able to escape their bullies for long periods and indeed may be subject to bullying due to their status as a boarder. The strategies and policies in place at the Foundation reflect these concerns as appropriate.

Occasionally, allegations may be made against students by others in the school. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a pupil's sexualised behaviour, including any known online sexualised behaviour, should record their concerns in the usual way on *MyConcern* or a Green Form and report them to the DSL as soon as possible, as with any other safeguarding concern. It is likely that for an allegation or concern to be addressed under safeguarding procedures, some of the following features will be found. The allegation or concern:

- is made against an older child and refers to their behaviour towards a younger child or a more susceptible pupil
- is serious, including a criminal offence
- raises risk factors for other children in the school
- indicates that other children may have been affected by this student
- indicates that young people outside the school may be affected by this student

Staff receive training to recognise and understand the wider environmental factors and context within which child-on-child abuse occurs and its impact on children. Such factors may include the potential for bullying and child-on-child abuse to take place across several social media platforms and services; and for things to move from platform to platform online. Each School will also consider the potential for the impact of the incident to extend further than their School's local community (e.g., for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator(s) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation.

Child-on-Child Sexual Violence and Sexual Harassment (SV/SH)

Sexual violence and harassment can happen between any children, of any age or gender, in any school setting, primary, secondary, and can involve individuals or groups. It may occur in person or online, physically or verbally. Staff must always adopt the mindset *that **it could happen within our Foundation schools***, even if there are no current reports.

Key points:

- Abuse may go unreported; vigilance is essential.
- These behaviours exist on a continuum and may overlap.
- Staff should be aware that girls are more often victims and boys are more often perpetrators**.**
- Victims must always be taken seriously, supported, and never made to feel at fault or like they're causing trouble by reporting.

Abuse can involve children from different schools. In such cases, DSLs from each school will work together with parents, police, and children's services to ensure the victim is supported. Staff should refer to KCSIE, Part Five and Appendix 14 for full guidance on handling, reporting, and recording incidents.

Harmful Sexualised behaviour

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive. Child-on-child sexual abuse is a form of HSB where sexual abuse takes place between children of a similar age or stage of development.

Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected, sexualised behaviour that doesn't have an overt element of victimisation or abuse. Reports of HSB or PSB will be shared with the DSL and/or pastoral staff and recorded using *MyConcern*. A trained member of staff will be allocated to support the young person and their

family. A referral into Early Support or Children's Services will be decided, depending on the seriousness of the incident, and the level of risk assessed for both the 'alleged perpetrator' and 'alleged victim' if there is another child involved.

32.0 Youth-produced sexual imagery (intimate images)

Schools must follow **DfE guidance** when managing incidents of youth-produced sexual imagery (YPSI), prioritising pupil welfare while avoiding unnecessary criminalisation. Key documents include:

Sharing nudes and semi-nudes (UKIS) (March 2025).
Searching, screening, and confiscation - Advice for Heads, school staff and governing bodies
Sharing sexual images of oneself or peers is illegal, but responses aim to support and educate rather than punish.

All incidents must be treated as a safeguarding concern and referred to the DSL. If a device contains indecent images, staff must **not view or print** them. The device should be confiscated and passed to the DSL immediately who will assess the situation to determine whether external agencies (Police, Children's Social Care) need to be involved, especially if there is a **risk of harm or involvement of children under 13, or sexual acts or coercion.**

Distinguish between:

- **Experimental incidents** (curiosity or poor judgement)
- **Aggravated incidents** (coercion, bullying, widespread sharing, adult involvement)
- In severe cases, a **multi-agency Child Exploitation (MACE)** meeting may be held

The DSL should avoid viewing images unless absolutely necessary and only if:

- It is essential to decide whether to involve agencies
- Required for reporting/removal from a website/app
- Unavoidable due to direct presentation or discovery

The decision must be agreed upon with Family Connect. Viewing is done only by the DSL or Deputy DSL, ideally with a staff member of the same sex as the student in the image. Another staff member must be present in the room.

Viewing occurs on **school premises**, ideally in the Head's or DSL's office. All actions must be recorded in the child's MyConcern file, signed and dated, in line with KCSIE standards.
If no external agency action is needed, schools may **delete images** from devices and online platforms to prevent further distribution. This approach supports the safeguarding and education of young people while ensuring proportionate, legal responses to YPSI incidents.

33.0 Serious Violence

Staff must be alert to the risk of serious violence, including concerns that a pupil may be carrying a weapon or intends to use one. Any such concerns, and any concerns about a child

who may be at risk of or involved in perpetrating serious violence, must be reported immediately to the DSL in line with safeguarding procedures. The DSL will assess the risk to the child and others, consider appropriate safety and support measures, take steps to de-escalate conflict where necessary, recognise any additional risks linked to exclusion, alternative provision or offending behaviour, and ensure that timely and appropriate early intervention is provided. Particular attention should be given to pupils with disrupted education or other vulnerabilities that may increase their risk of involvement in serious violence.

Indicators may include increased absence, 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 could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.

34.0 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments and outside school; and/or can occur between children outside the school.

Staff should recognise that safeguarding risks may increase during particular periods of the day, including before school, after school, during travel to and from school, and during unstructured times when supervision may be reduced.

The DSL, DDSLs, and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding means that assessments of children should consider wider societal factors beyond school and present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police to prevent children from suffering harm. The school will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse. Staff receive regular input regarding contextual safeguarding (including areas of safeguarding specific to the location of the school). This information is enhanced by data on reported crimes by Warwickshire Police through communication with other schools within the local and neighbouring community safety.

35.0 Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. **Child Criminal Exploitation (CCE)** is a form of child abuse. Both occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child or young person under the age of 18 into sexual and/or criminal activity. It may involve:

- an exchange for something the victim needs or wants
- and/or for the financial or other advantage of the perpetrator(s)
- and/or the increased status of the perpetrator/facilitator
- and/or through violence or the threat of violence
- grooming behaviour

Children who are criminally or sexually exploited should always be viewed as victims of abuse, even where they may appear to have consented to their involvement or have committed offences whilst under coercion, manipulation or control. Staff should be alert to the possibility that a child may have been criminalised as a consequence of exploitation.

Exploitation may be perpetrated by individuals, organised criminal groups, gangs, or organised sexual exploitation networks. Children may identify with, be associated with, or be coerced into involvement with such groups. Staff should remain alert to indicators of exploitation linked to organised networks.

The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur using technology. CSE and CCE can affect any child or young person, female, or male, under the age of 18 years, including 16- and 17-year-olds who can legally give consent to have sex.

Sexual Exploitation 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 may have created and posted on social media). CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets, and seaside towns.

Criminal Exploitation of children often involves force, enticement, and violence or threats, creating a power imbalance favouring the exploiters. This exploitation can be committed by individuals or groups, regardless of gender or age, and the power imbalance can stem from factors such as age, gender, cognitive ability, physical strength, status, and access to resources. Children may be lured into exploitation through offers of friendship, gifts, drugs, alcohol, and sometimes accommodation, and may be coerced into carrying weapons for protection.

The experiences of criminally exploited girls can differ from those of boys, and both are at risk of sexual exploitation. Staff are trained to recognise and report signs of exploitation (see Appendix 16 for indicators). Schools educate children about consent and the risks of exploitation through the PSHEE and RSE curriculum. Children often do not recognise the coercive nature of their relationships and may resist staff intervention, but staff must act on their concerns as with any abuse.

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. Further information and training for professionals on exploitation and modern slavery is available here - Modern slavery training: resource page - GOV.UK
All concerns about exploitation must be reported to the DSL immediately, who may refer the case to Family Connect in Warwickshire. A Multi-Agency Child Exploitation (MACE) meeting may be convened, where the school will share information, and parents and children will be invited to attend.

36.0 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of 'deal line.'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence), and weapons to ensure the compliance of victims.

Children can easily become trapped by this type of exploitation and become victims of modern slavery as County Lines gangs create drug debts and can threaten serious violence and kidnap victims (and their families) if they attempt to leave the County Lines network.
For further information see County Lines Guidance (2018) or County Lines Toolkit for Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council.

37.0 'Honour-based' abuse and violence

So-called 'honour-based' abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of a family and/or community. Such crimes include 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. Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA. All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit at 020 7008 0151 or via email at fmu@fco.gov.uk for advice, as necessary. Multi-agency statutory guidance for dealing with forced marriage can be found at The Right to Choose: government guidance on forced marriage.

38.0 Female Genital Mutilation

FGM is a form of child abuse involving partial or total removal of external female genitalia for non-medical reasons. It causes severe physical and psychological harm with no health benefits. FGM is illegal in England, Wales, and Northern Ireland under the FGM Act 2003. Maximum penalty: 14 years imprisonment, a fine, or both.

Mandatory Reporting Duty

Teachers must report directly to the police if they discover that FGM appears to have been carried out on a girl under 18. This statutory duty is personal and cannot be delegated. Teachers should also inform the DSL, unless there's a valid reason not to. A referral will also be made to Warwickshire Safeguarding or relevant Children's Services.
FGM risk can apply at any age, from infants to adult women. Staff are trained to identify risk indicators, especially around extended holidays abroad (e.g., during summer breaks).
Government guidance on mandatory reporting (2015, updates 2020)

Signs FGM May Have Occurred

- Difficulty walking, sitting, or standing.
- Long bathroom visits or problems urinating.
- Menstrual, stomach, or bladder issues.
- Absences from school and changes in behaviour, particularly following a visit from abroad
- Reluctance to have medical exams.
- Disclosures or complaints of pain in the genital area, often vague or embarrassing.

Concerns About Risk (Prevention)

If a girl is suspected to be at risk of FGM, staff must:

- Record the concern.
- Inform the DSL, who will consult Family Connect and report to the police if necessary.

Breast Ironing/Flattening

Breast ironing or flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened, and/or pounded down over a period (sometimes years) for the breasts to disappear or delay the development of the breasts entirely. Girls aged between 9 and 15 have hot pestles, stones, or other implements rubbed on their developing breasts to stop them from growing further. In many known cases, breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Breast ironing is a form of physical abuse. Staff or volunteers worried about the risk of breast ironing should report their concerns to the DSL immediately, who will contact Family Connect. If staff or volunteers are concerned that a student is in immediate danger, they should contact the police immediately by calling 999. The DSL will contact the Foreign and Commonwealth Office if the student has been taken abroad: Telephone – 020 7008 1500

39.0 Forced marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is different from an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. School staff will be particularly alert to suspicions or concerns raised by a child about being taken abroad and not being allowed to return to England.

Since February 2025 the change to the Marriage Act 1929 and the Civil Partnership Act 2004, raises the legal marriage age to 18 years old. 16 to 17-year-olds are no longer able to marry or enter a civil partnership under any circumstances, even with parental or judicial consent. (see https://www.gov.uk/forced-marriage for further information). When responding to concerns regarding Forced Marriage, advice can be sought from the Forced Marriage Unit: Telephone - (0) 20 7008 0151 Email - fmu@fcdo.gov.uk

40.0 Children in Care, previously Children in Care or children who have a social worker

The most common reason for children becoming children in care is because of abuse or neglect. Children who were previously children in care potentially remain susceptible. Schools should consider extra pastoral support and attention for these children, along with ensuring any appropriate communication support is in place. Each School ensures that staff have the necessary skills and understanding to keep children in care and children previously in care safe and ensures that appropriate staff have information about a child in care status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. There is a designated teacher in each school for children in care and previously children in care and the DSL holds details of the social worker and the name and contact details of the Local Authority's Virtual Head. This also includes care provided by relatives or family friends when a child cannot live with their parents.

Children with a Social Worker

Each school recognises when a child has a social worker, this is an indicator that they may be more susceptible to harm than other children as well as facing barriers to educational attainment, attendance, learning, behaviour, and poor mental health issues.
Each school takes issues and needs into account when making plans to support children who have a social worker.

Care leavers

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes staying connected with them, preparing an assessment of their needs, and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The DSL will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.

41.0 Private Fostering Arrangements

A private fostering arrangement occurs when a child under 16 (or under 18 with a disability) is cared for by someone other than a parent or close relative, without local authority involvement, for 28 days or more. Close relatives include grandparents, siblings, uncles, aunts, half-siblings, and stepparents but exclude great-aunts, uncles, great-grandparents, or cousins. Schools verify parental responsibility and the relationship of accompanying adults upon a child's admission.

Private fostering can occur in any culture and at any age. While most privately fostered children are safe, they are vulnerable and should be monitored by the local authority, especially those from other countries. Some may face abuse, neglect, trafficking, exploitation, or modern-day slavery. Parents and carers must inform Children's Social Care at least six weeks before the arrangement starts, failing which is a criminal offence.

Schools must report to Children's Social Care if they know or suspect a child is privately fostered. Staff should notify the DSL, who will check the family's awareness of their duty and ensure the school informs Children's Social Care.

42.0 Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. This can be particularly relevant concerning the impact on children of all forms of domestic abuse where they see, hear, or experience its effects. Young people can suffer domestic abuse in their intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Domestic Abuse Act 2022

Abusive behaviour is defined in the act as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- financial abuse

- psychological, emotional, or other abuse

Personally connected is defined in the act as parties who:

- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether the agreement has been terminated)
- have entered into a civil partnership agreement (whether the agreement has been terminated)
- are, or have been, in an intimate personal relationship with each other
- have, or there has been a time when they each have had, a parental relationship about the same child
- are relatives

The Act recognises children as victims of domestic abuse, and statutory obligations to victims of domestic abuse are afforded to children too.

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.

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Family Connect to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and the offer of Early Support/Family Help.

The Foundation participates in Operation Encompass which is a national safeguarding partnership that enables schools to receive information from the police following incidents of domestic abuse where a child has been present, witnessed the incident or may otherwise have been affected.

Information received through Operation Encompass will be shared only with appropriate staff on a need-to-know basis and will be used to provide timely and appropriate support to children. The Foundation recognises that children are victims of domestic abuse in their own right and will ensure appropriate support is made available following notifications received through Operation Encompass. https://www.operationencompass.org/

When the Police attend any incident of domestic violence or abuse in any household in which a child of the school lives, the Head and the DSL will receive a confidential and secure email on the morning of the next school day, notifying them simply that there has been an incident and that the child may need support. Schools should ensure that Operation Encompass notifications include the voice of the child where available and that appropriate information sharing takes place in line with data protection requirements. Where siblings attend other

schools within the Foundation, systems should be in place to ensure relevant safeguarding information is shared appropriately.

Children can be responsible for abusive behaviour towards a parent or carer and may be involved in domestic abuse incidents within the home. Such incidents may be reported to schools through the Operation Encompass initiative and should be considered within the wider safeguarding context for the child and family.

43.0 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) refer any concerns to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

In most cases, school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

44.0 Special Circumstances

Alternative Provision

Our school's retain overall responsibility for the safeguarding and welfare of any pupil attending Alternative Provision, regardless of who delivers the education.

Before a placement begins, the school will obtain written confirmation that appropriate safeguarding, child protection, safer recruitment, filtering and monitoring, attendance monitoring and health and safety arrangements are in place.

The DSL will maintain oversight of all pupils attending Alternative Provision and will ensure:

- The pupil's attendance is monitored regularly
- The pupil's whereabouts are known during school hours
- Safeguarding information is shared appropriately
- Any concerns are reported promptly to the school
- The effectiveness of the placement is reviewed regularly

The Foundation will work closely with providers, parents, carers and external agencies to ensure pupils remain safe and receive appropriate support.

Alternative Provision DFE statutory guidance;
https://www.gov.uk/government/publications/alternative-provision and
Education for children with health needs who cannot attend school;
https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school

Work Experience

The Foundation follows KCSIE guidance for safeguarding during work experience. Designated school staff in charge of work experience are responsible for maintaining and updating procedures.

Children Staying with Host Families

For trips involving host families (e.g., exchanges, sports tours), KCSIE, Annex D guidance is followed. For overseas pupils in private fostering arrangements, the school operates with the Local Authority. For international placements, schools use professional judgment and collaborate with partner schools to ensure pupil safety. Parents are informed, and pupils are given emergency contact advice.

Children and the Court System

Schools support children involved in court cases (as witnesses or victims) using KCSIE guidance. Support includes explaining court processes, special measures, and resources. The Ministry of Justice provides an online tool to assist with family court arrangements after parental separation.

Children with Parents in Prison

Recognising risks such as stigma and poor mental health, schools offer support via pastoral care and early support and have discussions with parents/carers and other family members as appropriate. Age-specific guides are available to support children aged 5–11 and 12–17.

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends, and acquaintances), and by strangers. Schools work with police on alerts and educate pupils about abduction risks. Practical safety advice is provided, especially for older children gaining independence. Resources: actionagainstabduction.org and clevernevergoes.org

45.0 Boarding Schools, Residential Special Schools, Residential Colleges, and Children's Homes

Research has shown that children can be particularly susceptible in residential settings. The Foundation's boarding schools comply with the National Minimum Standards and are appropriately inspected using the ISI framework for the inspection of association independent schools, including residential (boarding) schools, and registered early years settings. Links listed below:
www.gov.uk/government/publications/boarding-schools-national-minimum-standards
www.isi.net/safeguarding/statutory-guidance

Both Warwick School and King's High Boarding (Foundation Boarding) have and implement an appropriate policy on Safeguarding and Child Protection, this includes how to respond to allegations or suspicions of abuse, which is consistent with the locally agreed multi-agency safeguarding arrangements put in place by Warwickshire Safeguarding and is known to staff and known, as appropriate, to older boarders in positions of responsibility.

Foundation boarding DSLs/DDSLs and staff are trained to be alert to the signs of abuse in such settings (for example, inappropriate child or student relationships and the potential for child-on-child abuse, particularly where there are significantly more girls than boys or vice versa). The Foundation Boarding DSL works closely with the host local authority and, where relevant, any local authorities that have placed their children at the Foundation Boarding to ensure all children are safe and protected from harm.

The Foundation Head of Boarding and DSL, David Bull, is also Head of Warwick Boarding, d.bull@warwickschools.co.uk

King's High Boarding House Parent: Kirsten Cooper (DDSL) k.cooper@warwickschools.co.uk

Further information regarding Boarding arrangements at Warwick School and King's High School is found in Appendix 9.

46.0 Use of School Premises for Non-School Activities

When the Foundation hires or rents out school facilities to external organisations (e.g., community groups, sports clubs, or service providers), it must ensure proper safeguarding arrangements are in place to protect children. All lettings are managed by events@warwickschools.co.uk in consultation with each school's Designated Safeguarding Lead (DSL) when needed.

If the activity is **run by school staff**, the Foundation's safeguarding policies apply. If **run by an external provider**, the Foundation events team:

- Requires evidence of the provider's safeguarding and child protection policies
- Ensures there are appropriate channels for liaison with the school on safeguarding matters

- These requirements apply whether the children involved are Foundation students
- Safeguarding terms must be included in any lease or hire agreement, with non-compliance leading to termination

The Foundation follows guidance from the Keeping children safe in out-of-school settings - code of practice - keeping children safe during community activities after school clubs and tuition, non statutory guidance for providers running out of school settings which outlines expected safeguarding standards for external providers.

47.0 Modern Slavery

All Foundation staff is required to attend training on modern slavery and receive training to ensure they understand Modern Slavery, and how to recognise, report, and make a referral. Training is also provided for new staff joining the Foundation. Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality, and the removal of organs.

The National Referral Mechanism is the UK's framework for identifying and supporting victims of modern slavery. There are some common myths about modern slavery, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help. Further information on the signs that someone may be a victim of modern slavery, the support available to victims, and how to refer them to the NRM is available in the *Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims (2021)*

48.0 Cyber Crime

Cybercrime involves criminal activity using computers or the internet. It falls into two main categories:
Cyber-enabled: Traditional crimes made easier or more widespread online (e.g., fraud).
Cyber-dependent: Crimes that can only be committed using technology (e.g., hacking, malware attacks).
Education settings must implement and regularly review effective cybersecurity measures to protect their systems, staff, and pupils. The Foundation:

- Uses robust filtering and monitoring systems, which are reviewed regularly
- Provides regular cybercrime awareness training for all staff, including new starters

Cyber-dependent crimes include:

- Unauthorised access or hacking (e.g., changing grades)
- Denial of Service (DoS or DDoS) attacks
- Creating, using, or distributing malware (viruses, ransomware, etc.)

Cybersecurity is recognised as a safeguarding issue. Schools must ensure systems are secure and that staff understand risks such as hacking, phishing, and unauthorised access to systems which could compromise pupil safety.

Children interested in tech may unintentionally engage in cyber-dependent crime. In such cases, the DSL may refer them to the Cyber Choices programme, a national police-led initiative to positively redirect young people with technical skills. Note: Cyber Choices does *not* cover cyber-enabled crimes like online fraud or abuse.

Useful resources:

- Cyber security training for school staff (NCSC) – training and guidance for staff and governors.
- National Education Network – e-security support for education.
- Cyber Choices
- National Cyber Security Centre
- NSPCC – When to call the police

49.0 The Foundation's Complaints Procedure

The Foundation's complaints procedure will be followed when a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child or attempting to humiliate them, bullying, or belittling a child, or discriminating against them in some way. Complaints are managed by the relevant Head, other members of the senior leadership team, and governors.

Complaints from staff are dealt with under the Foundation's grievance procedures (see Foundation Grievance Policy).

50.0 Monitoring, evaluation and review of policy and procedures

Legal changes and obligations will require the Foundation Safeguarding and Child Protection Policy to be updated frequently. It is the responsibility of the Head, DSL, and Senior Leadership Team at each school to ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.

Governors undertake a review of the policy and procedures annually unless there are additions, such as a change in legislation. Governors are informed if any children from the Foundation are involved in a Child Safeguarding Practice Review.

DSLs individually meet with the Director of Safeguarding and Safeguarding Governor at least termly to feedback, monitor, and evaluate all safeguarding and child protection issues including staff training and they provide safeguarding reports for governor meetings. The Director of Safeguarding meets with Foundation DSLs monthly and then every half term to review policy, procedures, and practice which is then shared with the Safeguarding Governor and reported to the Foundation Safeguarding Committee.

Signed:	**Date:** September 2026
	Name: Rebecca Jessup Foundation Director of Safeguarding

	Gordon Latham	Foundation Director of People
	Anne Wilson	Foundation Safeguarding Governor

Appendix 1: KEY CONTACT NUMBERS DSL & DDSL

King's High School	Lisa Whittington	Deputy Head Pastoral	l.whittington@warwickschools.co.uk 01926 695936
Warwick School and Warwick Junior School	Richard Thomson Heather Mellor	Deputy Head Pastoral Deputy Head WJS	r.thomson@warwickschools.co.uk 01926 776400 H.mellor@warwickschools.co.uk
Warwick Prep School (including EYFS)	Deborah Ward	Head of Prep Department	d.ward@warwickschools.co.uk 01926 491545
The Kingsley School	Martha Bruchez	Deputy Head	m.bruchez@warwickschools.co.uk 01926 425127
Warwick Schools Foundation (Professional Services)	Rebecca Jessup	Foundation Director of Safeguarding	r.jessup@warwickschools.co.uk 01926 776426/ 07586679430

Deputy Designated Safeguarding Leads

King's High School	Clare Topping	Head of KS3	c.topping@warwickschools.co.uk
King's High School	Una Birbeck	Head of KS4	u.birbeck@warwickschools.co.uk
King's High School	Celia Tedd	Head of Sixth Form	c.tedd@warwickschools.co.uk
Warwick Prep School (including for EYFS)	Gillian Smeeton	Head of Pre-Prep Department	g.smeeton@warwickschools.co.uk
Warwick School	Amelia Stokes	Senior Mental Health Lead	a.stokes@warwickschools.co.uk
Warwick School	David Bull	Foundation Head of Boarding	d.bull@warwickschools.co.uk
Warwick Junior School	Heather Mellor	Deputy Head	h.mellor@warwickschools.co.uk
The Kingsley School	Dawn Morgan	DH Wellbeing and Pastoral	d.morgan@warwickschools.co.uk
The Kingsley School	Rachael Bubb	AHT Pastoral and wellbeing & Director 6th Form	r.bubb@warwickschools.co.uk
TKS (including EYFS)	Julie Johnson	Head of Prep	j.johnson@warwickschools.co.uk

Foundation Principal: Richard Nicholson	r.nicholson@warwickschools.co.uk
Safeguarding Governor: Anne Wilson	an.wilson@warwickschools.co.uk
Deputy Safeguarding Governor: Joanna Broughton	j.broughton@warwickschools.co.uk
Police **999/101**	Emergency/non-emergency
Family Connect **01926 414144**	Child at immediate risk of/harm
Warwickshire Education Lead **01926 418608**	Non-emergency advice for staff
DfE Counter Extremism Helpline **020 7340 7264**	Non-emergency advice for staff
FGM Helpline **0800 028 3550**	Advice when FGM is suspected, or a student is at risk of FGM
Warwickshire Family Information Service **01926 742274**	Advice for parents
Local Authority Designated Officer (LADO) **01926 745376**	Safeguarding concerns/allegations regarding a member of staff
Oxfordshire MASH **0345 050 7666**	Children living in Oxfordshire
Coventry MASH **024 7678 8555**	Children living in Coventry
Solihull MASH **0121 788 4300**	Children living in Solihull
Northamptonshire MASH **0300 126 7000**	Children living in Northamptonshire
Birmingham MASH **0121 303 1888**	Children living in Birmingham

Appendix 2: Summary of the role of the DSL (KCSiE, Annex C)

The Designated Safeguarding Lead (DSL) is an appropriate senior member of staff and takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
The Deputy designated safeguarding leads (DDSL) should be trained to the same standard as the designated safeguarding lead, whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability:

The DSL (or a deputy, DDSL) must be available during school hours for safeguarding concerns, with availability defined by each school. They can use phones or MS Teams, for example, in exceptional cases. Schools must also arrange cover for out-of-hours or out-of-term activities.

Manage Referrals:

The DSL must refer cases of suspected abuse, radicalisation, risks/harm to children, and crimes to the appropriate authorities (children's social care, Channel Panel, Disclosure, and Barring Service, Police) and support staff in these processes.

Working with Others:

The DSL acts as a support source for staff, liaises with safeguarding partners, headteachers, case managers, and local authorities on child protection issues, coordinates with various school staff on safety and welfare matters, engages parents, and promotes educational outcomes for vulnerable children.

Information Sharing and Managing Child Protection Files:

DSLs keep safeguarding files up to date, confidential, and secure, maintaining detailed records of concerns, follow-ups, and outcomes. When children transfer schools, their safeguarding and child protection files should be transferred promptly and securely, with key staff informed. A process is in place that enables the Foundation Director of Data to oversee the secure redaction of pupils' safeguarding files, ensuring confidentiality and compliance with data protection standards.

Raising Awareness:

The DSL ensures staff understand and access the safeguarding policy, reviews the policy annually, makes it publicly available, links with safeguarding partners for training and policy updates, and promotes educational outcomes for children with a history of social care involvement.

Training, Knowledge, and Skills:

DSLs must undergo biennial training, online safety, and Prevent awareness training. They should understand local authority procedures, child protection, the impact of adversity, information sharing, the Prevent duty, online safety, and the needs of vulnerable children. Their skills should be refreshed regularly.

Providing Support to Staff:

DSLs must develop expertise to support and advise staff on welfare, safeguarding, and child protection, ensuring they feel confident in these areas.

Understanding the Views of Children:

DSLs must encourage a culture of listening to children, understanding their difficulties in approaching staff, and building trusted relationships for better communication.

Holding and Sharing Information:

DSLs must be adept at recording, holding, using, and sharing information in line with data protection laws and safeguarding regulations. They ensure detailed, accurate, and secure records of concerns and referrals. DSL should keep written records of all concerns, discussions, and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA Children's Social Care or Prevent

Meetings and Reviews:

DSLs meet termly with the Director of Safeguarding and the designated Safeguarding Governor, collaborating to prepare the annual review for the Governing Body.

Appendix 3: Four Categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect. (pages 18)

Physical abuse

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness, Fii).

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as long as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. Children are more likely to be abused by someone they know than by a stranger. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see Section 31).

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs (KCSIE)

Affluent Neglect

Affluent neglect refers to situations where a child's emotional, developmental, supervisory or welfare needs are not adequately met despite the apparent availability of financial resources. Indicators may include:

- Persistent lack of parental supervision
- Emotional unavailability
- Excessive academic pressure
- Exposure to inappropriate adult situations
- Risk-taking behaviours
- Unrestricted access to online content
- Unmet emotional or mental health needs

Staff should avoid assumptions based on background, status or family circumstances and should report concerns in line with safeguarding procedures.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell.' It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons, staff must be also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns however minor or insignificant they may think they are, they do not need 'absolute proof' that the child is at risk. Staff should be professionally curious, not make assumptions based on background, recognise patterns and not just incidents and act on early support indicators. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures, or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless regarding their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied

- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development and/or
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

Impact of abuse

The impact of child abuse, neglect, and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy, and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood, and adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential, and long-term physical health difficulties.

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of '*It could happen here'*.

Key points for staff to remember when acting are:

- in an emergency take the action necessary to help the child, for example, call 999
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day
- do not start your investigation; share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family
- complete a record of concern, using *MyConcern*/ a Green Form
- seek support for yourself if you are distressed or need to debrief

Appendix 4: How a teacher can report an act of FGM

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act (2003) (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g., through a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Information and Government guidance on mandatory reporting (2015, updates 2020) includes when and how to make a report.

Teachers in that situation will record their concerns and inform the DSL, (unless there is a good reason not to), who will support the teacher in making a direct report to the Police. A referral will also be made to Warwickshire Safeguarding. or other appropriate regional Children's Services.

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. The DSL will discuss the concern with Family Connect to make a referral and will inform the Police as appropriate.

Appendix 5: Additional Support for Online Abuse

The following resources, plus many more listed in KCSiE, Annex B may also help schools understand and teach about safeguarding:

- DfE advice for schools: teaching online safety in schools
- DfE guidance on Generative artificial intelligence (AI) in education
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The UKCIS external visitors' guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: '*Thinkuknow* ' https://www.ceop.police.uk/Safety-Centre/
- UK Health Security Agency and the Office for Health Improvement and Disparities (OHID)
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers, and where to get help and support
- Educate against Hate **-** www.educateagainsthate.com
- Prevent and Radicalisation - The DfE telephone helpline and mailbox can be used by school staff and governors seeking non-urgent advice: counter.extremism@education.gov.uk 020 7340 7264.

Prevent and Radicalisation

All concerns about extremism are reported immediately to the DSL, who may refer to the Police, Prevent team, or Channel programme.

Schools promote safe discussion, critical thinking, and resilience against extremist narratives. All adults associated with the school (including contractors and visitors) must follow the Foundation Staff Code of Conduct and challenge extremist ideas or behaviours. Referrals will be made where necessary.

As part of the school's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from pupils, parents, staff, and partner agencies; and latest information from local (Warwickshire Prevent and Police) and national issues and learning to review practice and procedures to keep children safe.

Appendix 6: Procedure for Managing Concerns and Allegations Against Staff (page 26)

Initial Response to Receiving a Concern About Staff

Receiving and Handling Concerns:

- Heads, Bursar, Governors, or the Director of Safeguarding receive concerns via Yellow Forms.
- Deputy Heads may handle forms in the Head's absence and DDSL for Professional Services may handle forms in the absence of the Director of Safeguarding.
- Concerns reported to the DSL are forwarded to the appropriate Head.
- Verbal reports are documented in an online Yellow Form with details.
- Heads or the Director of Safeguarding make decisions on low-level concerns, consulting the DSL if necessary.
- Concerns are assessed to determine if they meet the 'harm' threshold, with advice sought from the LADO if needed.

Collaboration and Documentation:

- Foundation Schools collaborate on concerns, with each Head keeping a log of low-level concerns and regularly supported by the Director of Safeguarding.
- New staff are briefed on low-level concerns and the process of how to make a referral during induction and training.
- Supply staff, trainee teachers and contractor concerns are reported to their employers.
- Procedures are reviewed and adjusted based on staff feedback.

Classifying Concerns:

- The Head, Bursar, Director of Safeguarding, or the Governor can investigate and gather information.
- Concerns are reviewed to determine if they align with the Foundation Staff Code of Conduct, constitute a low-level concern, or require LADO consultation or referral.

Responding to Low-Level Concerns:

- Concerns are addressed sensitively and proportionately.
- Minor concerns may not need action; others may require management guidance or training, and some may form a pattern of concerning behaviour which may require an investigation.
- Discussions with the concerned individual aim for constructive feedback and behaviour change.
- HR advice is usually sought for concerns involving, safeguarding, allegations of harm, welfare issues, misconduct, or poor performance.

Record-Keeping:

- All concerns are recorded in writing, detailing the reporter, the individual concerned, context, conversations, determinations, and actions taken.
- Centralised records are securely kept, accessible to limited personnel, and not stored in personal files.

Anonymity and Review:

- Reporter anonymity is respected where possible but not guaranteed in all situations.
- Records are periodically reviewed to identify behaviour patterns and improve policies and training.
- Low-level concerns may not be included in references unless they meet the LADO referral threshold and are substantiated. However, if there is a pattern or a series of low-level concerns that may not meet the threshold for harm, an investigation by the Head/Bursar, with the support of the Director of Safeguarding, will take place. The member of staff may also be suspended or dismissed due to their inappropriate conduct or behaviour.

Role of Governors:

- Governors receive regular updates on low-level concerns and concerns where the threshold of harm is met.
- The Safeguarding Governor may review anonymised samples to ensure proper handling.

Responding to Allegations:

- Allegations of serious concerns are reported to the LADO within one working day.
- Procedures ensure quick and fair resolution, with support for both the child and the accused staff member.
- Allegations against different staff groups follow specific procedures, with supply teacher or contracted staff cases handled in collaboration with employment agencies.
- Outcomes of LADO investigations are classified as substantiated, malicious, false, unsubstantiated, or unfounded.

Initial Response to an Allegation Against a Staff Member

1. Immediate Actions

Upon receiving an allegation, the Case Manager, typically the Head, Director of Safeguarding or Chair/Vice-Chair of Governors, must immediately consult the **Local Authority Designated Officer (LADO)** to assess the nature, context, and seriousness of the allegation and determine the appropriate next steps. The Case Manager may collect relevant background information, including any previous concerns or allegations, to support the initial assessment. Consideration is given to whether police involvement is necessary.

If the allegation indicates an immediate risk to children or a potential criminal offence, the police are contacted without delay.

2. Case Management and LADO Involvement

The Case Manager works closely with the LADO throughout the process, keeping relevant school authorities informed and involved in decision-making. Based on the shared information, the Case Manager and LADO determine a suitable course of action, which may include further investigation or inquiries.

3. Evaluation and Decision-Making

If the LADO decides no further action is necessary, this outcome is formally recorded and communicated to all relevant parties.

If an external investigation (by police or local authority) is not required, internal options may be explored, ranging from no action to disciplinary measures, including summary dismissal. If at any point a significant risk or criminal element emerges, the police are informed immediately.

4. Informing Relevant Parties

Following agreement with the LADO (and, where appropriate, police and social services), the accused staff member is informed of the allegation. They are supported throughout the process by an HR representative.

Parents are informed in confidence, provided this does not compromise the integrity of the investigation.

Anonymous Allegations are investigated to the extent possible, following the same procedural safeguards.

5. Suspension Procedures

Suspension is considered when there is a clear risk to children or the nature of the allegation is sufficiently serious. Where appropriate, alternatives such as redeployment or supervised duties are explored. If suspension is necessary, the rationale is clearly documented, and the staff member is informed in writing within one working day.

6. Support for Those Involved

The accused staff member is kept informed throughout the process, offered access to counselling or other support services, and provided with a named contact for ongoing assistance.

Parents are updated on the progress and outcome of the case and advised of any legal restrictions on information sharing.

Confidentiality is strictly maintained, and all efforts are made to avoid unwanted publicity. Where legal restrictions apply, the identity of the accused cannot be disclosed.

7. Record Keeping

Comprehensive records are maintained for all allegations, whether substantiated, unsubstantiated, or unfounded, including the rationale behind all decisions. Malicious or demonstrably false allegations are removed from personnel files. Records of allegations involving sexual abuse are retained indefinitely, in line with statutory guidance.

8. Resignations and Settlement Agreements

An investigation will proceed even if the accused resigns or ceases employment before the

conclusion of the process. Where appropriate, referrals are made to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Authority (TRA). Allegations that are found to be false, unfounded, unsubstantiated, or malicious must not be included in any employment references.

9. Post-Investigation Actions and Learning

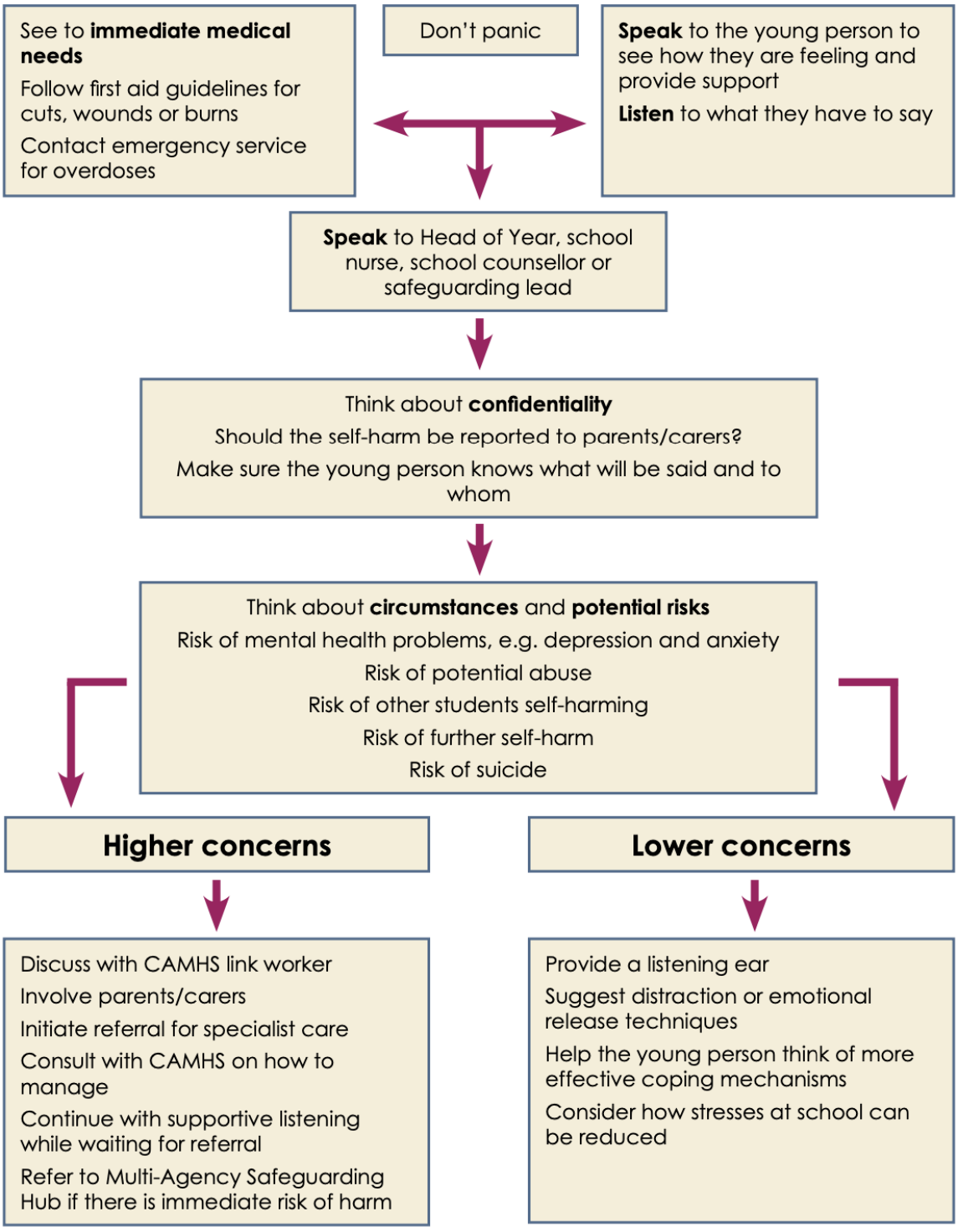
Following any criminal proceedings, the school determines whether further internal action is needed, in consultation with the LADO. Findings from substantiated or complex cases are reviewed to inform and improve safeguarding policies and procedures. Staff and volunteers are encouraged to raise concerns about unsafe or inappropriate practices.

The Foundation Whistleblowing Policy outlines clear procedures for doing so. Allegations involving former staff are handled according to current safeguarding protocols and reported to the appropriate authorities. (See KCSIE Part 4 for greater detail)

Appendix 7: (page 29)

Self-harm at school: what to do?

To be used in conjunction with the school's safeguarding policy



Appendix 8: Children who are absent from Education (pages 30)

Child is missing education and their whereabouts are **KNOWN**	It is each School's responsibility to follow their attendance procedures. They can seek support from the Warwickshire Attendance Service
Child is missing education and their whereabouts are **UNKNOWN**	A referral must be made to the Children Missing Education Team

Each of the Foundation Schools follows the DfE legal requirements (Education (Pupil Registration) (England) Regulations, 2006) in respect of placing all children on both registers (Admissions and Attendance) and in respect of recording and reporting those children who leave their School with an unknown future destination. Where a child has 10 consecutive school days of unexplained absence, without permission and their whereabouts are unknown, the schools take all reasonable steps* to establish their whereabouts. If unsuccessful, the schools will make an immediate referral to Warwickshire County Council's Children Missing Education Team at **01926 736323 or via email at** cme@warwickshire.gov.uk

**** Reasonable steps* include***:*
Telephone calls to all known contacts. Parents are asked to provide a minimum of three emergency contacts in the event of children not arriving at school without prior notification and for other emergency purposes

- Letters home (including recorded delivery)
- Contact with other schools where siblings may be registered
- Home visits where safe to do so
- Enquiries to friends, neighbours, etc. through school contacts
- Enquiries with any other service known to be involved with the pupil/family
- Consideration of information about the child in social media
- All contacts and outcomes will be recorded on the pupil's file.

If the Local Authority can contact the child with the child/children and their parents and carers, arrangements will be made with the school and family for a return to education. This may include a re-integration programme where necessary. If the child has registered at a new school, the previous school will delete the child's name from their roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

Visit www.warwickshire.gov.uk/childrenmissingeducation for more *information* or to access the referral form. Effective information sharing between parents, schools, and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving a suitable education.

Elective Home Education can mean that some children are not in receipt of a suitable education. Many home-educated children have a 'positive learning experience. If a parent has informed the school of their intention to remove their child to electively home educate their child, the school should notify the Elective Home Education *Team* immediately by email **(**ehe@warwickshire.gov.uk **/ tel. 01926 736323)**. The school is advised to allow the parent or carer (10 school days/2 weeks of reflection before removing their child from the school roll, as this is best practice.

Children who run away or go missing from home or care

The Foundation recognises that children who run away or go missing (particularly repeatedly) and are thus absent from their *normal* residence are potentially susceptible to abuse, exploitation, and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It could also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage.

KCSIE highlights that 'Statutory Guidance on Children who Run Away or go Missing from Home or Care' (DfE 2014) requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI).

Appendix 9: Warwick School and King's High School - Boarding House Arrangements (pages 54)

The Foundation recognises the unique status of the boarders within its communities and the potential risks they may face as a result.

In addition to the existing Foundation Safeguarding and Child Protection Policy, Warwick and King's High School acknowledge their responsibilities as boarding schools following the National Minimum Standards for Boarding Schools National Minimum Standards (NMS).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102344/National_minimum_standards_for_boarding_schools.pdf

NMS8:

8.1 The school should ensure that:

• arrangements are made to safeguard and promote the welfare of pupils at the school, and • such arrangements have regard to any guidance issued by the Secretary of State.

8.2 The school should ensure that all staff know that safeguarding and promoting the welfare of children is everyone's responsibility throughout the school and the boarding facilities.

8.3 It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school's approach to online safety should be reflected in the child protection policy regarding KCSiE.

Boarding School, staff must be particularly alert to safeguarding pupils against the risk of child-on-child abuse. Children may be particularly vulnerable in residential settings. In reflection of that, there are additional requirements for Boarding Schools that are set out in KCSIE and the National Minimum Standards for Boarding Schools.

8.4 KCSiE sets out that boarding schools have additional factors to consider regarding safeguarding. As such it will be important that the boarding school's child protection policy (and/or other policies if appropriate) reflect:

• the school's policy on sexual relationships between children (and the importance of boarders understanding this policy); Boarders sign to say they have read and understood Relationships between Boarding Pupils Policy on induction

• the school's approach to child-on-child abuse, reflecting the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation (this is reflected in the Relationships between Boarding Pupils Policy)

• the approach to protecting children where there is a significant gender imbalance in the school (this is reflected in the Relationships between Boarding Pupils Policy)

• the approach to harmful online content and how boarders' devices are managed in terms of bringing a device into the school, harmful content that may already be downloaded onto it, and the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems.

Where appropriate, House Prefects and senior children are provided with a briefing on the appropriate action to take should they receive any allegations of abuse (NMS19).

The schools have a policy for the search and reporting of any boarder missing from their school that is known to all boarding house staff. A written record is made of any boarder missing from either school, the action taken, and any reasons for the child being missing.

The schools have a separate Child Missing Policy which includes Boarders.

Procedure for Missing Boarder:

During the School Day:

The procedure is the same as that for a missing day pupil, but includes:
Contact the Foundation Head of Boarding

Outside the Normal School Hours:

The boarders are registered at various points during the day. This is done using the electronic Orah boarding software system. Boarding staff should be aware of boarders' planned activities after school and at weekends. Boarders are required to "sign in and out" of the boarding houses. When leaving they are required to give details of where they are going and when they will return. Any requests for "off-campus leave" must be authorised/agreed upon by boarding staff.

In the event of an unexplained absence of a border outside normal school hours, the following should happen:

- The Foundation Head of Boarding and House parents are notified
- An attempt will be made to contact the missing boarder on their mobile telephone (by a school device and not Boarding staff's personal devices)
- Duty staff will carry out a complete search of the Boarding House and those areas of the school to which the boarders have access
- Duty staff will interview peers to ascertain the boarder's last known whereabouts and any plans they may have had
- In daylight and if practical, a thorough search of the grounds will be carried out
- The fire alarm will be sounded, and a Roll Call taken
- The Head of Boarding or, in their absence, Duty staff, will contact the Head or the duty member of the SMT
- Parents and Police would then be informed by the Head, duty member of the SMT
- The Police would be notified if the whereabouts of the boarder are still unknown, and the school will cooperate fully with any Police investigation and any subsequent investigations
- The Head will inform the Principal and the Governors
- Media enquiries would be referred to the Head

The Foundation is signed up to the Safeguarding "Commitment to Care" Charter.
UK Visas and Immigration:

(a) If a pupil/student holding a Student or Child Student visa sponsored by the School under the Points Based System goes missing, the School will report to UKVI if the pupil/student misses ten consecutive expected contact points.

(b) Each time the School's attendance register is completed it is treated as a contact point for these purposes
(c) The report will be made by the School's Level 1 user via the Sponsor Management and by prevailing UKVI guidance.

It is understood that all staff and children have immunity from retribution or disciplinary action for 'whistleblowing' in good faith.

The school adheres to NMS19 in instigating appointment checks for all staff by acknowledging safety.

In addition to the requirements for all staff it should be noted that this includes ALL adults coming into contact with Boarders:

Following NMS19.2 for all adults who after April 2002 begin to live on the same premises as children/students but are not employed by the school, there is a verifiable Disclosure & Barring Service check completed at the standard level. This includes all members of staff Households who are aged 16 and over (not on the roll, nor employed by the Foundation) and who live on the same premises as Boarders. See NMS19. Residents over the age of 16 and not employees of the school also sign an agreement that sets out the conditions of their residence.

The Foundation has taken reasonably practicable checks to carry out Disclosure & Barring Service checks on taxi drivers booked by the school to drive boarders unaccompanied by staff.

Warwick School and King's High School have instigated measures to ensure that all boarders are protected from unsupervised contact at School with adults who have not been subject to the school's complete recruitment checking procedures and there is supervision of all unchecked visitors to the boarding premises.

The school does not allow any member of staff (including ancillary staff, sessional/contract staff, and volunteers) to work unsupervised with boarders unless that member of staff has been satisfactorily checked with the Disclosure & Barring Service.

Under the revised NMS19 the DBS certificate for 'gap' students is to be obtained before or as soon as practicable after the appointment.

The DSL or a DDSL can be contacted at any time whilst students are in the boarding house even if the member of boarding staff with DDSL training is not on duty.

The welfare of boarders is safeguarded and promoted while accommodated away from the school site on short-term visits. Any off-site short-stay accommodation arranged by the school for any of its boarders provides satisfactory accommodation and supervision is checked by the school (although this may not be feasible when accommodation is in private households) and is monitored by the school during use.

If an allegation is made against a residential member of boarding staff, then whilst the matter is being investigated and until it is resolved, the boarding house staff member will be provided with alternative accommodation arrangements i.e., not in a boarding house.

Boarding pupils going on trips should be treated in the same way as a day student and be in line with the relevant school trips policy.

Boarders- Educational Guardians and Host Families:

All boarding pupils at the Foundation schools must, irrespective of age, have an Educational Guardianship arrangement in place for the duration of their time in the Foundation. These guardians are appointed by the pupil's parents, and the school does not recommend or endorse any individuals or agencies in this regard. The Foundation sets out its expectations regarding the Educational Guardian within the **Foundation Educational Guardianship Policy**, and all arrangements made by families must comply with this Policy. Any changes to the guardianship arrangements must be communicated to the appropriate school immediately.

The Foundation, and particularly the appropriate boarding staff, will monitor the Educational Guardianship arrangements in place for each boarding pupil and will regularly assess their suitability against the criteria set out in the Foundation Educational Guardianship Policy. Regular reviews of the arrangements will take place with the individual pupils to ensure that they are happy with the arrangements and that they have no concerns. Any issues raised during such reviews will be reported to the DSL, ~~using the child protection procedures~~, and discussed with the pupil's family immediately.

Appendix 10: Safeguarding pupils in online learning and communication between staff and pupils

Staff delivering online or virtual lessons must adhere to The Foundation's Safeguarding and Child Protection, Code of Conduct, and Acceptable Use of ICT Policies to ensure safety and compliance. The Foundation follows guidance from the DfE, UK Safer Internet Centre, National Grid for Learning, and London Grid for Learning. Guidance from the UK Safer Internet Centre on safe remote learning, the National Grid for Learning, and the London Grid for Learning on the use of videos and live streaming.

Lessons will be conducted using Foundation-owned devices and accounts, with parents informed about the operations. This will ensure that The Foundation's filtering and monitoring software is enabled.

Staff must notify a Senior Manager for one-to-one lessons or communication with vulnerable children. Lessons should be scheduled, allowing senior staff to monitor them. Non-scheduled meetings require consultation with senior staff.

Staff must remain vigilant for signs of distress or vulnerability in children and report concerns to the DSL. Online lessons should maintain the same conduct standards as in-person, including appropriate dress, setting, and language. Backgrounds should be blurred, and resources should be age appropriate. Lessons should be kept to reasonable lengths, and recorded lessons should be deleted after use. Only approved platforms should be used.

Any issues with inappropriate dress, behaviour, or setting during lessons should be addressed immediately, and sessions can be ended, if necessary, with incidents reported to the DSL. If the unauthorised recording is suspected, the session should be terminated. Personal devices should only be used in exceptional cases, with senior staff approval and caller ID withheld.
Staff must follow strict rules on personal online activity and communication with pupils, as outlined in the Staff Acceptable Use of ICT Policy, with breaches potentially leading to disciplinary action or referral to the Local Authority Designated Officer (LADO).

In **rare and exceptional circumstances** where staff urgently need to contact a pupil or parent by telephone and do not have access to a school-owned device, **they will discuss this with a senior member of staff**. If it is agreed there is no alternative to using a personally owned device, staff members will always use '***caller withheld***' to ensure the pupil and/or parent is not able to identify the staff member's contact details.

Appendix 11: Equalities and Additional Risk Factors

Some children have an increased risk of abuse, and additional barriers can exist for some children to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We will ensure appropriate consideration of children who are:

- disabled, have special educational needs, or have mental health needs
- young carers
- affected by parental substance misuse, domestic abuse, and violence, or parental mental health needs
- asylum seekers
- in receipt of support and services from a social worker
- susceptible to being bullied, or engaging in bullying behaviours
- living away from home or in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- susceptible to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
- at risk of child sexual exploitation (CSE) and/or child criminal exploitation
- at risk from or are involved with serious violent crime
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of becoming involved with or supporting extremism
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk due to either their own or a family member's mental health needs
- are a child in care or previously child in care
- are missing from education
- whose parent/carer has expressed an intention to remove them from school to be home-educated

Appendix 12: Sport

The school recognises its duty to provide safe, fair and inclusive opportunities for pupils to participate in physical education and sport. In accordance with safeguarding requirements and the Equality Act 2010, pupils may be separated by biological sex for sports and competitive activities where differences in physical strength, stamina or physique could affect safety or fairness. Some sports may require single-sex participation to protect pupil safety, while others may be organised on a single-sex basis to ensure fair competition.

Where a pupil requests changes to how they participate in sport, the school will consider the request on an individual basis, taking account of the pupil's welfare, safeguarding needs, best interests, the impact on other pupils, and the need to maintain safe and fair sporting environments. Decisions will be informed by relevant statutory guidance and, where appropriate, advice from National Governing Bodies.

Appendix 13: Toilets, Changing Rooms and Showers

Our school is committed to protecting the safety, privacy, dignity and wellbeing of all pupils. In line with statutory requirements, toilets, changing rooms and shower facilities designated for boys and girls will be provided and accessed according to pupils' biological sex.

Where a pupil is uncomfortable using facilities designated for their biological sex, the school will consider alternative arrangements where appropriate, such as access to a separate self-contained toilet, changing area or shower facility, or access at an alternative time. Any alternative arrangements must not compromise the safety, privacy, dignity or wellbeing of the pupil concerned or of other pupils.

Each school will maintain clear records of any arrangements made, ensure relevant staff are appropriately informed, and review arrangements regularly as part of its safeguarding responsibilities. Any mixed-sex facilities, where provided, will be subject to appropriate risk assessment and safeguarding measures.

Appendix 14: Safer Recruitment (page 15)

The Foundation endeavours to ensure that we do our utmost to employ only suitable staff and allow only suitable volunteers to work with children by complying with the requirements of KCSIE together with the Foundation Safer Recruitment Policy and the Independent Schools' Regulatory Requirements. The schools operate safe recruitment procedures which include procedures to comply with the statutory guidance Disqualification under the Childcare Act (2016).

The Head (and/or other school leaders as appropriate) and at least one governor will attend safer recruitment training, and the school will ensure that there are at least two school leaders and/or governors that have attended safer recruitment training within the past three years.

Safer recruitment means that all applicants will:

- complete an application form that includes their employment history and explains any gaps in that history. CVs on their own will not be deemed to provide sufficient safeguarding information and are not accepted by the Foundation unless submitted with a completed application form;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications. Documentation such as marriage certificate/birth certificate/divorce confirmation etc. will be required to verify name/change in name;
- if offered employment, be checked by the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
- An enhanced DBS check and a barred list check for those including unsupervised volunteers engaged in Regulated Activity;
- An enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children;
- an enhanced DBS check for all governors (not including associate members), which will only include a barred list check for governors involved in Regulated Activity;

There is an increased expectation for strengthened checks, particularly for individuals who have lived or worked overseas. Where necessary, following regulatory requirements and the Foundation policy, overseas checks/certificates of good conduct for those who have lived or worked abroad will be required. The Foundation will follow the appropriate guidance about the recruitment of overseas-trained teachers, as specific guidance is currently being updated by the government. Additional measures will be put in place where it is not possible to obtain such documentation;

- if offered employment, provide evidence of their right to work in the UK;
- be interviewed by a panel of at least two school leaders/governors, if shortlisted.

The schools will also:

- ensure that every job description and person specification for roles in school includes a description of the role holder's responsibility for safeguarding;
- ask at least one value-based question at the interview for every role in school about the candidate's attitude to safeguarding and motivation for working with children;
- as part of the shortlisting process, good practice is for the Foundation's HR department to inform shortlisted candidates that online searches will be carried out. This may help identify any incidents or issues that have happened and are publicly available online, which the school might want to explore with the applicant at the interview. If these

checks are not carried out at the shortlisting stage, they will be completed as part of the pre-employment checks
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities
- obtain references, from senior persons with appropriate authority, for all shortlisted candidates, including internal candidates, and verify the source of each reference. This may require seeking additional references to ensure appropriate checks are carried out to confirm suitability to work with children
- carry out additional or alternative checks for applicants who have lived or worked outside the UK
- ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State
- check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school.

At least one member of each recruitment panel has attended safer recruitment training.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the school's Safeguarding and Child Protection Policy and Staff Code of Conduct via our eLearning portal.

All existing staff are required to confirm annually via our eLearning platform that they have read a copy of the Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy, and KCSIE Part One, Prevent Information and Acceptable Use Policy. At present, all staff who encounter children under 8 in EYFS are required to confirm that they are not disqualified from providing childcare by the Childcare Regulations, updated in 2018. The definition of which members of staff across the Foundation are within the scope of this legislation will be reviewed during the academic year.

The Foundation obtains written confirmation from supply agencies and third-party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly; and that those individuals are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The Foundation maintains a Single Central Record (SCR) of recruitment checks undertaken and ensures that the record is maintained by KCSiE, Part 3 of and guidance issued by Warwickshire County Council.

Further details about the measures in place to support safer recruitment are found in the Foundation's Recruitment and Selection Policy.

Schools are 'specified places' which means that most staff and volunteers will be engaged in Regulated Activities. A fuller explanation of Regulated Activity can be found in KCSiE, Part 3. KCSIE requires many previously supervised volunteers who engage in regulated activity with children to undergo an enhanced DBS check with children's barred list information; contractor vetting requirements remain unchanged and will continue to be determined through risk assessment.

Volunteers

Volunteers will undergo checks commensurate with their work in the school and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or allowed to engage in regulated activity. From 1 September 2026, volunteers who engage in regulated activity with children will be subject to an enhanced DBS check including children's barred list information. The school will determine the appropriate level of checks through risk assessment and in accordance with KCSIE and DBS requirements.

Contractors

The Foundation checks the identity of all contractors and their staff on arrival at the school/college and requests DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in Regulated Activity, barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

Visitors

All visitors are expected to observe safeguarding procedures (see Section: 19, Site Security). Where visiting speakers are invited into the school by staff, the school will ensure that they are suitable and appropriately supervised. The school will ensure that appropriate vetting has been undertaken, which will at least include an internet search to ascertain the speaker's suitability. All staff will be made aware of the need to ensure that the Prevent guidance for visiting speakers is carried out.

Staff Awareness Requirements

Staff must be aware of:

- The Early Support process and their role in it.
- Identifying emerging problems, liaising with the DSL, and sharing information with other professionals for early identification and assessment.
- The referral process to local authority children's social care and statutory assessments that may follow, including their potential role in these processes.
- Actions to take if they identify a safeguarding issue or if a child reports abuse or neglect, including issues like FGM, while maintaining appropriate confidentiality.
- Signs of various types of abuse and neglect, and specific safeguarding issues such as child-on-child, online harm, child sexual exploitation (CSE), child criminal exploitation (CCE), risks of serious violent crime, FGM, and radicalisation.
- The importance of reassuring victims that they are taken seriously, supported, and kept safe.

Appendix 15: Data Protection Act 2018

The **Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025** place duties on the school and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, neither the DPA nor the GDPR prevent or limit the sharing of information to keep children safe. and promoting their welfare. KCSIE states clearly that "*Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children*".

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, or another member of the senior management team and contact the Foundation Data Team at data@warwickschools.co.uk for advice, as in some instances, there may be sensitive information such as court orders in place or police involvement.

It is reasonable for staff to discuss day-to-day concerns about children with colleagues to ensure that children's general needs are met in school. However, staff should report all safeguarding and child protection concerns to the DSL. The DSL will then decide who else needs to have the information, and they will disseminate it on a 'need-to-know' basis.

KCSIE emphasises that the DSL or a deputy DSL should always be available and that this availability should not delay appropriate action. Staff should speak to a member of the senior management team or seek advice from Family Connect in Warwickshire or other Local Authority Child Protection Service, if they are concerned about a child.

Where children leave the school, the DSL should ensure their safeguarding and child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5-10 days of the start of a new term to allow the new school to have support in place for when the child arrives.

The DSL must check that the information being transferred to a new school does not include other pupils' data. For advice on what to redact, please contact the Foundation Data team.

The DSL should ensure secure transit, and confirmation of receipt should be obtained. Receiving schools and/or colleges should ensure key staff, such as DSLs and special educational needs coordinators (SENCOs) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

In addition to the safeguarding and child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, etc.

More information on the safeguarding and child protection file is in KCSiE, Annex B.

Information sharing will take place in a timely and secure manner, and where it is necessary and proportionate to do so; and the information to be shared is relevant, adequate, and accurate.

All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which requires that sensitive information is:

- processed for limited purposes
- adequate, relevant, and not excessive
- accurate
- kept no longer than necessary
- processed by the data subject's rights
- secure

Record of concern forms (Green Forms) must be scanned and saved to *MyConcern*, which is held securely on the network.

The Foundation's policy on confidentiality and information-sharing is available to parents and children on request.

Appendix 16: Child on Child Abuse and Child-on-child Sexual Violence and Sexual Harassment (SV/SH) (page 37)

The Foundation enforces a strict zero-tolerance policy and outlines key actions schools must take to address and prevent such behaviours.

Types of Abuse Include:

- Bullying (including cyberbullying, prejudice-based, discriminatory)
- Sexual violence (rape, assault by penetration, sexual assault; includes online-facilitated abuse)
- Sexual harassment (comments, jokes, online harassment)
- Coercing sexual activity without consent
- Teenage relationship abuse (pattern of physical, sexual, emotional abuse in relationships)
- Prejudiced behaviour causing exclusion related to identity, disability, ethnicity, gender, sexual identity

Sexual Violence: As defined in the Sexual Offences Act (2003)

Sexual Harassment: Unwanted sexual conduct that violates dignity or creates a hostile environment

Consent: Must be informed, freely given, and can be withdrawn; under 13s cannot legally consent; the age of consent is 16

Preventative Measures:

- Curriculum covering respect, consent, and healthy relationships
- Zero tolerance culture for sexism and sexual violence
- Regular staff training on identification and response
- Delivery of Relationships Education, Relationships and Sex Education, and Health Education (RSHE) aligned with the school's policy and broader PSHEE programmes (e.g., Jigsaw Scheme, Beyond Equality resources, PSHEE Association guidelines)
- Inclusive teaching addressing the needs of SEND and vulnerable children
- https://shorespace.org.uk/ link to support young people

Staff Awareness:

- Additional barriers for children with disabilities or special needs are considered
- Awareness that perceived or actual LGBT+ children may be vulnerable

Response to Reports:

Immediate risk assessment by DSL, who then liaises with Children's Social Care and Police as needed. The victim is supported and reassured. It is often necessary to separate the victim and the alleged perpetrator during investigations. Risk assessments are placed to ensure the

protection needs of the victim, the alleged perpetrator, and the safety of others in consultation with social workers and specialists.

Following reports of abuse, minor incidents are managed internally with parental involvement and pastoral support. Early Support is provided for cases of non-violent, harmful sexual behaviour. For serious harm or offences, referrals are made to Children's Social Care or the Police.

Victim trauma and distress are carefully addressed, especially in serious cases such as rape. To reduce contact between the victim and the alleged perpetrator, separation is arranged on school premises and during transport, without implying guilt. It is also recognised that the alleged perpetrator may themselves be a victim of exploitation or coercion.

Ongoing support is tailored for all parties involved. The victim's routine is maintained, and a safe space is provided to support their well-being. Educational access is ensured for everyone involved.

One-off incidents of sexual harassment may be managed internally through behaviour and anti-bullying policies, with communication to parents and pastoral support. Separation of the victim and alleged perpetrator is considered where necessary. Early Support or Family Help may be offered to prevent the escalation of harmful behaviour.

All concerns, decisions, and the reasons behind these decisions are carefully documented in safeguarding records.

Appendix 17: Exploitation (page 45)

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- a child travelling outside the area in which she/he lives to transport, distribute, or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines**
- a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived, or manipulated
- a child being forced to shoplift or pickpocket
- a child being forced to threaten other young people
- a child being forced to work in a cannabis factory
- a child being forced or manipulated into committing vehicle crime or threatening/coming serious violence of others
- a child can be threatened (and their families) with violence or entrapped and coerced into debt

They may be coerced into carrying weapons or begin to carry a knife for protection:

- a child being forced to commit a crime to settle actual or fabricated debts
- gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang
- a child being encouraged or manipulated to commit a crime via social media
- a child receiving food, money, kudos, or status in return for storing a weapon or drugs for others.

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

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- children appearing with money, clothes, mobile phones, etc. without plausible explanation
- children who associate with other young people involved in exploitation
- children in relationships with controlling or significantly older individuals or groups
- children frequenting areas known for sex work and/or criminal activity
    - children who associate with gangs and/or become isolated from their peers/social networks
    - children receiving excessive texts/phone calls
    - multiple callers (unknown adults or peers) to children
    - concerning the use of the internet or other social media by children
    - increasing secretiveness around children's behaviours
    - children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant
    - children self-harming or presenting with significant changes in their emotional well-being
    - children who misuse drugs and alcohol
    - children who go missing for periods or regularly come home late

- children who regularly miss school or education, have unexplained absences or do not take part in education
- children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them (for further information see Preventing Youth Violence and Gang Involvement (2015);
- evidence of/suspicions of children suffering physical or sexual assault

Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

- having a prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example):
- recent bereavement or loss
- social isolation or social difficulties
- absence of a safe environment to explore sexuality
- financial vulnerability
- homelessness or insecure accommodation status
- connections with other children and young people who are being sexually and/or criminally exploited
- family members or other connections involved in adult sex work and/or other criminal activity
- having a physical or learning disability
- being looked after (particularly those in residential care and those with interrupted care histories)
- issues/anxieties about sexual identity

Appendix 18: ISI Safeguarding Standards - Safeguarding

83. Leadership must ensure that arrangements are made to safeguard and promote the welfare of pupils[1] that meet the requirements of the Standards and (as applicable) the Early Years Foundation Stage statutory framework, The National Minimum Standards for boarding schools, the National Minimum Standards for Residential Special Schools, or the National Minimum Standards for Accommodation of Children under Eighteen by Further Education Colleges.

84. Inspection findings regarding safeguarding are based on the evidence available to inspectors at the time of inspection. Inspectors probe and evaluate this evidence carefully and robustly, informed by applicable statutory guidance. However, inspection cannot provide absolute assurance that a school is safe.

85. The proprietor must ensure that leaders and managers have effective arrangements in place:

- to safeguard and promote the welfare of pupils which fulfil the requirements of the latest statutory guidance[2] and any other safeguarding regulations applicable to the school
- that promote the school's effective working with other partnerships and agencies to safeguard pupils and protect them from harm
- that effective measures are taken to manage risk and protect pupils from harm, and to manage well any incidents that do occur

86. Leadership must ensure that the school has effective arrangements, reviewed regularly, to ensure pupils know how to stay safe online.

87. Leadership must ensure that the applicable requirements of the Standards[3] Relating to the suitability of staff, supply staff and proprietors are met.

Early years

88. The inspection team will consider how effectively leadership actively promotes the well-being of all children in early years provision at the school when making judgments for the whole school.

89. An evaluation of the school's provision for children from birth to five is also reported by the requirements of the Early Years Foundation Stage framework[4].

90. Provision for children under the age of two in a registered setting is also evaluated and reported following the requirements of Ofsted's Education Inspection Framework[5] and associated guidance.

Boarding

[1] Whether the pupil is a pupil at the school

[2] Keeping Children Safe in Education and any other related applicable statutory guidance from time to time in force.

[3] ISSR part 4

[4] https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

[5] https://www.gov.uk/government/collections/education-inspection-framework

91. Leadership must ensure that arrangements are made to safeguard and promote the welfare of pupils[6] for whom the school provides accommodation (boarders), which meet the requirements of (as applicable) the National Minimum Standards for boarding schools[7]

92. The inspection team will consider how effectively leadership actively promotes the well-being of boarders when making judgements for the whole school.

93. Any specific aspects of provision relevant only to boarding pupils, and not covered elsewhere in the report, will be reported under a section in the report on boarding.

[6] Whether or not the pupil is a pupil at the school

[7] The National Minimum Standards for boarding schools