



KEY EXTERNAL CONTACT DETAILS

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Local Authority Services	Children and Families' Front Door (formerly MASH) TEL: 01926 414144 EMAIL: masheducationlead@warwickshire.gov.uk Front Door Education Lead/DSL information line TEL: 01926 418608 CONTACT: Dawn Parson Education Safeguarding Service TEL: 01926 742601; EMAIL: sophiemorley@warwickshire.gov.uk CONTACT: Sophie Morley Headteacher Coach TEL: 01926 413625/07425 623337 CONTACT: Carl Lewis
Support and Advice about Extremism	Police Warwickshire Police TEL: 01926 415000 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: 101@warwickshire.police.uk Local Authority Warwickshire County Council TEL: 01926 412432 EMAIL: geoffthomas@warwickshire.gov.uk PREVENT OFFICER: Geoff Thomas

	Department for Education NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gov.uk
NSPCC Whistleblowing Advice Line	TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	TEL: 03000 200 190 EMAIL: customerservices@db.s.gov.uk
Teaching Regulation Agency	TEL: 0207 593 5393 EMAIL: TRA.Caseworker@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: enquiries@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: info@isi.net

KEY SCHOOL CONTACT DETAILS

Governors	Chair of Governors Mr Victor Matts EMAIL: VMatts@kes.net Nominated Safeguarding Governor Mrs Fiona Fairbairn EMAIL: FFairbairn@kes.net
Designated Safeguarding Lead ("DSL") and Deputy Designed Safeguarding Lead ("DDSL")	Main DSL for the School Mr Christopher Dunford TEL: 01789 293351 EMAIL: cd@kes.net Deputy DSLs Mr Thomas Walton EMAIL: tmw@kes.net Miss Rachel Biggs EMAIL: rb@kes.net Mr Steve Temple EMAIL: st@kes.net Mrs Louisa Nightingale EMAIL: lin@kes.net

	Mr Luke Gardiner EMAIL: lwg@kes.net Ms Myliss Barton EMAIL: ab@kes.net Mr Ben Lanoe EMAIL: bl@kes.net
Designated Teacher for Looked After Children	Mr Thomas Walton EMAIL: tmw@kes.net
Headmaster	Mr Bennet Carr TEL: 01789 293351 EMAIL: headspa@kes.net

1. INTRODUCTION

The safety and welfare of all students at King Edward VI School ('the School') is our highest priority. In all matters relating to safeguarding and child protection the School will follow the procedures laid down by our Local Safeguarding Children Executive which is Warwickshire Safeguarding Children Executive (WCSB) (or where appropriate the relevant child's LCSE) together with Department for Education (DfE) guidance contained in Working Together to Safeguard Children (December 2023) and Keeping Children Safe in Education: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> (KCSIE 2025). KCSIE also provides links to various toolkits and additional advice and support. This policy also has regard to the following guidance and advice.

- *Prevent duty guidance: Guidance for specified authorities in England and Wales (December 2023). Prevent is supplemented by a briefing note:

 - *How social media is used to encourage travel to Syria and Iraq (July 2015)**
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education (September 2021).*
- *Children's Social Care National Framework (December 2023)*
- *Behaviour in schools (February 2024)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)*
- *Children Missing Education (August 2024)*
- *Digital and technology standards in schools and colleges (March 2025)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)*
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)*

This policy is applicable to the whole School community. The School has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

2. EQUALITY ACT 2010

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

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

3. SAFER EMPLOYMENT PRACTICES

The School is committed, as part of our whole approach to safeguarding, to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School. Members of the Senior Leadership Team are trained in Safer Recruitment.

The School follows the Government's guidance and recommendations for the safer recruitment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations (where applicable). Please also see the School's Recruitment, Selection and Disclosures policy and procedures and Staff Handbook for full guidance on the School's safer recruitment procedures.

In line with part 3 of KCSIE, the School's governing body prevents people who pose a risk of harm from working with students by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors

or consultants working on site are asked for specific assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements. Where contractors provide services to the School, the School's safeguarding requirements are set out in the contract between the organisation and the School.

As part of carrying out safer recruitment procedures under KCSIE, members of the teaching and non-teaching support staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references and checking work history. For most appointments, an enhanced DBS check with 'children's barred list' information will be appropriate. A DBS certificate will be obtained from the candidate as soon as practicable after appointment but before they commence work. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

In addition, as part of the shortlisting process the School may consider carry out an online search as part of the due diligence. 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(s) at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management checks.

All governors, volunteers and contractors working regularly during term-time are also subject to the statutory DBS checks. Where appropriate, confirmation is obtained that vetting checks apply to any staff employed by another organisation and working with the School's students at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

The School maintains a Single Central Register of vetting checks undertaken.

4. STAFF RESPONSIBILITIES

All members of staff have a duty to safeguard students' welfare and must therefore familiarise themselves and comply at all times with this policy. Safeguarding and promoting the welfare of children is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

Mrs Fiona Fairbairn is the **Designated Governor** for safeguarding issues. The role of the Designated Governor is to take leadership responsibility for the School's safeguarding arrangements and to liaise with the local authority on issues of child protection or in case of allegations against the Headmaster or a member of the governing body.

The **Full Governing Body**, in conjunction with the Designated Safeguarding Lead (DSL), carries out an annual review of the School's Safeguarding Policy and procedures with day-to-day issues being delegated to the DSL and Headmaster. The Governors are responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice; and
- ensuring the Safeguarding Policy of the School is effective and that it is available on the School website

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's safeguarding policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The School draws on the expertise of staff, including the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead, in shaping the School's safeguarding arrangements and policies. The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, students, parents, and carers.

Mr Chris Dunford, Assistant Head, is our **Designated Safeguarding Lead** (DSL). His contact details are cd@kes.net and 01789 293351. He has been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex C of KCSIE. He is a member of the Senior Leadership Team at the School and therefore has the status and authority within the School to carry out the duties of the post, including committing

resources and supporting and directing other staff. Mr Thomas Walton, Mr Steve Temple, Miss Rachel Biggs, Mr Ben Lanoe, Miss Myliss Barton, Mrs Louisa Nightingale and Mr Luke Gardiner are the School **Deputy DSLs (DDSL)**. They are trained to the same standard as the DSL. Either the DSL or DDSL will always be available to discuss safeguarding concerns.

Both the DSL and DDSL undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and DDSL will also attend refresher training updated at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

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

Both the DSL and DDSL have job descriptions for their safeguarding roles and key activities, as follows:

The Designated Safeguarding Lead (DSL):

- takes the lead responsibility for safeguarding and child protection matters within the School
- acts as a source of support and expertise to the School community
- encourages a culture of listening to children and taking account of their wishes and feelings
- is alert to the specific needs of children in need, those with special educational needs, looked after children and young carers
- has a working knowledge of Warwickshire Safeguarding Children Board (WSCB) procedures
- has an understanding of the Pathway to Change (Early Help) process to ensure effective assessment and understanding of children's additional needs in order to inform appropriate provision of early help and intervention
- keeps detailed written records of all concerns, ensuring that such records are stored securely, but kept separate from, the student's general file

- refers cases of suspected abuse to Children’s Social Care, the DBS, Channel or the Police as appropriate
- notifies Children’s Social Care if a child with a child protection plan is absent for more than two days without explanation
- ensures that when a student leaves the School, including for in-year transfers, all child protection records are passed to the new School (separately from the main student file and ensuring secure transit) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard the child and to help the child thrive in the school. If the child is the subject of an open case to Children’s Social Care, the student’s social worker is also informed
- attends and/or contributes to child protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings
- co-ordinates the School’s contribution to child protection plans as part of core groups, attending and actively participating in core group meetings
- develops effective links with relevant statutory and voluntary agencies including the WSCB
- be responsible for liaising with the senior mental health lead, and where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- ensures that all staff have read and understood the Safeguarding Policy
- has a working knowledge of relevant national guidance in respect of all specific safeguarding issues ensuring that all staff receive necessary training, information and guidance
- ensures that the Safeguarding Policy and procedures are regularly reviewed and updated annually by the Full Governing Body
- liaises with the nominated Governor and Headmaster as appropriate
- keeps a record of staff attendance at child protection training
- makes the Safeguarding Policy available publicly on the School’s website
- ensures parents are aware of the School’s role in safeguarding and that referrals about suspected abuse, exploitation and neglect may be made
- promotes the educational achievement of children who are looked after by the Local Authority
- considers how students may be taught about safeguarding, including how to keep themselves safe at all times including online, as part of a broad and balanced curriculum
- takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place

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

The Deputy Designated Safeguarding Lead (DDSL)

- The DDSL is trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the DDSL will assume all of the functions above.

The DSL role is to ensure that each member of staff has access to, is aware of, and understands the School's safeguarding policy and procedures, and that staff training meets the requirements of KCSIE. Whilst the Headmaster should ensure that the policy and procedures adopted (particularly those concerning referrals of cases of suspected abuse, exploitation and neglect), are understood and followed by all staff, and the Governors are ultimately responsible for ensuring that staff are competent, supported, and regularly monitored in relation to safeguarding, the DSL has ultimate staff responsibility for safeguarding and child protection in the School. This responsibility will not be delegated.

The DSL and/or the DDSL (or in their absence the Headmaster) can be contacted at any time (during or outside School hours) for staff in School to raise or discuss any safeguarding concerns.

The DSL maintains close links with WSCB and reports at least termly to the Full Governing Body on safeguarding issues. The DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Designated Officer at the Local Authority ('LADO') in relation to allegations against someone working at the School and/or the Police if a criminal offence is suspected.

The DSL will liaise with the local authority when necessary and work with other agencies in line with *Working Together to Safeguard Children* and attend strategy meetings. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support students at risk of harm including emotional and intellectual harm via social media and use of the internet.

The DSL receives focused training to support learning and understanding of the ever-changing landscape of safeguarding which is underpinned by legislation and guidance. Training will include online safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours and sexual harassment between children. The DSL and DDSL will receive training to ensure their skills are up to date and have the confidence that they are equipped with the relevant knowledge and capability required to keep children safe online. Training will include the additional risks children with SEN and disabilities face

online so that the DSL and DDSL have the capability to support these students. The DSL undertakes in-depth training on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling him to support other staff on Prevent matters and update them on relevant issues. The DSL's and the School's focus is to support children in need through seeking early help and/or inter-agency working, including using the Team around the Child Approach and/or the Common Assessment Framework. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

5. INDUCTION AND TRAINING

Every new member of staff, including part-time, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation; and on the procedures for recording and referring any concerns to the DSL or DDSL and to external agencies; and to the main points of local procedures of WCSB (<http://www.warwickshire.gov.uk/wscb>). Child protection and safeguarding training is also given to new governors.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Training in child protection and safeguarding is an important part of the induction process. All staff will be provided with induction training that includes:

- the School's Safeguarding Policy (including the policy and procedures to deal with child-on-child abuse) and Staff Handbook (which includes the staff Behaviour Policy/Code of Conduct and Whistleblowing Policy)

- the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying). This includes Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements
- the acceptable use of the internet, social media and technology (including mobile phones)
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- the identity and role of the DSL and DDSL
- a copy of part 1 of KCSIE or, for identified staff that do not work directly with children, Annex A
- School leaders and staff who work directly with children will also be required to read Annex B of KCSIE.

Copies of the above documents are provided to all staff during their induction.

Training also promotes staff awareness of child sexual exploitation, Prevent (including referrals to Channel programmes), so called 'honour based' abuse, forced marriage and female genital mutilation (FGM). The website www.educateagainsthate.com is designed to equip staff and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and school leaders.

Training on the early help process and process for making a referral to local authority Children's Social Care and for statutory assessment that may follow a referral (including what role staff may be expected to play in such an assessment) will also be provided together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Staff are made aware of the signs, symptoms and indicators of such abuse and/or neglect and are required to take action *without delay* if abuse and/or neglect is suspected.

All staff must read and sign to confirm that they have read at least part 1 of KCSIE or, for identified staff that do not work directly with children, Annex A and are assessed on their understanding. Temporary staff and volunteers are also provided with part 1 of KCSIE or, for temporary staff and

volunteers that do not work directly with children, Annex A and asked to confirm they have read and understood it. School leaders and those staff who work directly with children will also be required to read part 5 of KCSIE and Annex B.

All staff receive appropriate safeguarding and child protection training every 2 years which is regularly updated in line with advice from WSCB. In addition, all staff receive safeguarding and child protection updates as required, but at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively, to include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment) and Prevent awareness training.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR). Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR). The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In addition, the School complies with the DfE's Data Protection guidance for schools, ensuring school staff and Governors know how to comply with data protection law, develop their data policies and processes, what staff and student data to keep and the importance of good practices for preventing personal data breaches.

6. STAFF OBLIGATIONS

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

All School staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns. The Governors ensure that mechanisms are in

place to assist staff to understand and discharge their role and responsibilities as set out in part 1 of KCSIE. This includes twilight and INSET training, as well as a standing item during Staff Meetings.

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the DSL immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

7. TYPES AND SIGNS OF ABUSE, EXPLOITATION AND NEGLECT

Recognising abuse

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

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

Abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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

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

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

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or 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).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or

developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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

- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, sexual assault and assault by penetration and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity but not another, or penetration with conditions, such as wearing a condom. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can constitute sexual assault.

The Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. There are also the below resources available:

- Tackling Child Sexual Abuse Strategy – Home Office policy paper
 - Together we can stop child sexual abuse – HM Government campaign
- **Sexual harassment** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories,

making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual “jokes” or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, or upskirting, and sharing of unwanted explicit content (for example, displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos often referred to as the sharing of nudes/semi-nudes, or sexting; inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

- **Sexual violence and sexual harassment** (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.
- **Harmful sexual behaviour** is problematic, abusive and violent sexual behaviour that is developmentally inappropriate and may cause developmental damage. A useful umbrella term is ‘harmful sexual behaviour.’ Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour. The Lucy Faithfull Foundation has also developed a harmful sexual behaviour toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about harmful sexual behaviour by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals – The Contextual Safeguarding programme based at the University of Durham provides a school self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

StopItNow – Preventing harmful sexual behaviour in children provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

- **Child-on-child sexual violence and/or harassment** can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or 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 care-givers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions are taken from *Working Together to Safeguard Children* (December 2023).

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 it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL immediately.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, exploited 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 with regard to their own or other's safety
- self-harm
- suffer from changes in emotional well-being
- go missing for periods of time or regularly come home late

- miss school or education or do not take part in education.
- 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 school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable, about drugs or alcohol
- suffer from sexually transmitted infections, display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development or become pregnant
- acquire unexplained gifts, money, or new possessions

All staff should be aware of indicators of abuse (see above), understanding that children can be at risk of harm inside and outside of the School, inside and outside of home and online. If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection and to speak to the DSL if they have concerns.

Self-Harm

Self-harm is any behaviour where the intent is to cause deliberate harm to one's own body. School staff can play an important role in preventing self-harm, building resilience and supporting students, peers and parents of students currently engaging in self-harm.

Referral procedures are:

- Member of staff reports their concern to DSL/DDSL
- A record of the concern is submitted by via CPOMS
- All staff to be aware of the support available in South Warwickshire for children and young people who deliberately self-harm.

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.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are. They do not need 'absolute proof' that the child is at risk.

Pathway to Change (Early Support) Assessment

Pathway to Change means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Any child may benefit from Early Support but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- has a mental health need
- is a young carer is showing signs of being drawn in to anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from education, home or care
- is misusing alcohol and other drugs themselves
- is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is at risk of 'honour-based' abuse such as female genital mutilation or forced marriage
- is a privately fostered child
- is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

Early Support is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early Support may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual students. All staff undertake appropriate training to ensure that they know when to share

information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who identify a child who may benefit from Early Support should discuss with the DSL, who will consider the appropriate action to take in accordance with the Warwickshire Safeguarding Children Executive referral threshold document (which can be found here: <https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people>).

The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If Early Support is appropriate, the matter will be kept under review and consideration given to a referral to Children's Social Care if the student's situation does not appear to be improving. Further guidance on effective assessment of the need for Early Support can be found in Working Together to Safeguard Children (December 2023).

8. DEALING WITH CONCERNS OR SUSPICIONS OF ABUSE OR NEGLECT

The School treats the safeguarding of all students in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk.

The School recognises that there may be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as Children's Social Care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies (such as a Pathway to change Warwickshire Children Services Front Door) as appropriate.

If a member of staff suspects or is made aware of any allegation or complaint of abuse, exploitation or neglect, or if knowledge of possible abuse or neglect comes to their attention, it is their duty to act immediately and follow the procedure below. Staff should not assume that somebody else will take action, and share information that might be critical to keep a child safe. The guidance *'Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers'* supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements are in place for sharing information within the School and with local authority Children's Social Care, the safeguarding partners and other organisations, agencies, and

practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 nor the UK GDPR prevent the sharing of necessary information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the DSL.

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk
- not providing students' personal data where the serious harm test is met.

All staff should be prepared to listen carefully to the child, observe their behaviour and provide reassurance to the child that the allegation/complaint will be taken seriously and that they will be supported and kept safe. Hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should not ask leading questions and only prompt the child where necessary with open questions. Whilst leading questions should be avoided staff can ask children if they have been harmed and what the nature of that harm was.

All staff should ensure that the child is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report. Staff should not guarantee absolute confidentiality (as this may ultimately not be in the best interest of the child); rather staff should explain to the child that the matter will be referred in confidence to the appropriate people who will ensure that the correct action is taken. All staff should be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns. It should be up to staff to determine how best to build trusted relationships with children and young people which facilitate communication.

The School implements a child centered approach to safeguarding. Whilst the School are committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process. Please see section below entitled 'Student's wishes'.

All concerns, discussions and decisions (including the rationale for those decisions) made under these procedures should be recorded using CPOMS. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should provide a clear and comprehensive summary of the concern, including the date, time and place of the conversation, who was present and what was said and done by whom. It should be signed by the person making that written record. A record should also be made of how the concern was followed up and resolved and any action or decision taken. The information should be kept confidential and stored securely, ensuring that the record is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts 1 and 2 of KCSIE.

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

Every member of staff, including part-time, temporary, visiting, contract and volunteer staff working in School must report any concerns (including those where a student may benefit from early help or where it includes alleged abuse by one or more students against another student) to the DSL. However, any staff member can make a direct referral to local authority Children's Social Care or other external services such as early help services in accordance with the referral threshold set out by WCSB. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Where staff (including governors, supply staff, agency staff and volunteers) have concerns that a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the Police immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Anyone can make a referral and staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff must share information with Children's Social

Care and/or the Police where there are any concerns that a child may be at risk of harm or neglect. Parental consent is not needed to make referrals to statutory agencies such as the Police or Children's Social Care.

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the LADO for advice, where necessary.

The DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the LADO within 24 hours of staff being aware of the risk. Borderline cases will be discussed with the LADO without identifying individuals in the first instance and, following discussions, the LADO will judge whether or not an allegation or concern meets the relevant threshold. The LADO will decide in the circumstances what further steps should be taken. This could involve calling the Police.

The LADO should acknowledge receipt of the referral to the referrer within 24 hours and make a decision about the next steps and type of response required. Where the outcome of a referral to the LADO is not reported back to the referring member of staff or DSL, staff should challenge the inaction and follow this up with the DSL who will follow this up with Children's Social Care. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with Social Services and the Police. If the School has questions about any police investigation, it will ask the police.

With regard to the Prevent duty, the School will co-operate with Channel panels and the Police when assessments are being undertaken. Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a student, staff must firstly raise this with the DSL without delay. The DSL will consult with external agencies, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to Children's Social Care or the Police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with Children's Social Care or the Police what information can be disclosed.

In the case of child-on-child abuse which the School has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with under the School's Behaviour Policy after discussion with the LADO. Further information is provided in the section below.

The DSL will report all safeguarding concerns to the Headmaster (provided they do not concern the Headmaster).

For children in need of additional support from one or more agencies, the School will use the Pathway to Change process. The School's local authority is Warwickshire County Council which operates the WCSB. The School's points of contact are set out on page 1 of this policy.

9. ALLEGATIONS OF CHILD-ON-CHILD ABUSE (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

The School recognises that children are capable of abusing their peers (often referred to as child-on-child abuse), and has regard to KCSIE part 5 in this regard. The School acknowledges that child on child abuse can be standalone or as part of wider abuse and can happen both inside and outside of school, and online.

It can manifest itself in many ways and can include but may not be limited to:

- abuse within intimate partner relationships between children (sometimes known as 'teenage relationship abuse')
- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- consensual and non-consensual sharing of nude images and/or semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- gender based issues
- sexual behaviours including child on child sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse),
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously. The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and will consider extra pastoral support for those children. The School recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School also recognises the different gender issues that can be prevalent in child-on-child abuse, for example, girls being sexually touched, or boys being subjected to initiation type violence. All child-on-child abuse will be managed in accordance with this Policy, and any statutory and non-statutory guidance, including KCSIE. A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm. Such an incident warrants a response under these procedures rather than the School's Behaviour Policy.

The School recognises that a child is likely to make a disclosure of an allegation to someone they trust and that this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. All staff should be

clear as to the School's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present, preferably one of them being the DSL or DDSL.

A student against whom an allegation of abuse has been made may be excluded from the School during the investigation. The School will take advice from the WSCE on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved (including the alleged victim and perpetrator). If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the WCSB, parents are informed as soon as possible. Students involved will be supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the WCSB or the Police as appropriate. The School will have regard to the procedures set out in KCSIE at all times.

Where there is a safeguarding concern, the School will ensure that the student's wishes and feelings are taken into account when determining the action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. The School takes a zero-tolerance approach and concerns about abusive comments or interactions will not be dismissed as 'banter' or 'part of growing up', nor will harmful sexual behaviours ever be dismissed as the same or "just having a laugh" or "boys will be boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to students within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

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

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSLs who should consider parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSLs will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breast and genitalia or up skirting. Allegations of rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to Children's Social Care and/or a report to the police against a victim's wishes, the reasons should be explained to the student and appropriate specialist support offered.

When there has been a report of sexual violence, the DSL (or a DDSL), and indeed all staff, will reassure the victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression from staff that they are creating a problem by reporting any form of abuse and/or neglect; nor will they be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). Following a disclosure, the DSL (or DDSL) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;

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

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

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

Following a report of sexual violence and/or sexual harassment the DSL will consider the appropriate response. This will include:

- The wishes of the victim in terms of how they want to proceed
- The nature of the alleged incident(s)
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- If the alleged incident is a one-off or sustained pattern
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Any ongoing risks, and
- Other related issues and context (including any links to child sexual exploitation and child criminal exploitation).

Any response and action will, as always, have at the centre the best interests of the child.

In the event of a disclosure of child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk and the School will follow the safeguarding procedures set out in this

Policy. All children will be offered support by the School, as appropriate, which may include the use of the School Counsellor or referral to other external support channels.

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

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

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

10. OTHER SAFEGUARDING ISSUES

Contextual safeguarding

Staff will be made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours, for instance those linked to drug taking and/or alcohol abuse, deliberately being absent from education, serious violence (including that linked to county lines), radicalisation, truancy, gender-based violence and sexting also put children in danger.

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence, and the full context of any abuse.

Serious violent crime

All staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

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

Upskirting

Upskirting is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim. All staff must follow the procedures for child-on-child abuse above, or allegations of abuse against staff below (as applicable), should they have any concerns that this may have taken place, or following a disclosure.

Sexting and incidents involving sharing nudes and semi-nudes between students

All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery

- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

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

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

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DSL will follow the UKCIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not.

The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

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

If staff become concerned about a 'sexting' issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff should confiscate the device. The confiscated device will be passed immediately to the DSL. Staff will not look at or print any indecent images.

The DSL will make a judgement about whether the reported 'sexting' incident is experimental or aggravated.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of nudes and semi-nudes created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sexting will usually be referred to Warwickshire's Children and Families' Front Door for advice about whether or not a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:

- there are any offences that warrant a Police investigation
- child protection procedures need to be invoked
- parents/carers require support in order to safeguard their children
- a multi-agency sexual exploitation (MASE) meeting is required

- any of the perpetrators and/or victims require additional support. This may require the initiation of a Pathway to Change and the offer of early help services.

Examples of aggravated incidents include:

- any evidence of pressurising, intimidating, bullying, extortion and/or threatening of students by one or more other students to create and share indecent images of themselves
- pressure applied to a number of students (e.g. all female students in a class or year group) to create and share indecent images of themselves
- pressurising a younger student or students to create and share indecent images of themselves
- pressurising a student with additional vulnerability to create and share indecent images of themselves
- dissemination of indecent images of young people to a significant number of others (either as an act of so-called 'revenge porn' or exploitation)
- any evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim).

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident; or whether the School is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social Care through Children and Families' Front Door to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

Preventing Radicalisation and Extremism

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Whilst staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to radicalisation in to terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent duty can be found below.

. Further information and a list of such indicators can be found at Radicalisation and Extremism – Examples and Behavioural Traits (educateagainsthate.com).

Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL who should be aware of the local procedures in place.

The Home Office statutory Prevent duty guidance can be accessed on:

https://assets.publishing.service.gov.uk/media/65e84b6008eef600115a5679/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Print.pdf

The Department for Education non-statutory Prevent duty guidance can be accessed on:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Channel General Awareness course can be accessed on:

<https://www.support-people-susceptible-to-radicalisation.service.gov.uk/portal>

The School, in recognition that students may be susceptible radicalisation into terrorism, has published a separate Anti-Radicalisation Guidance document for staff and also carries out appropriate risk assessments (following consultation with local partners, such as the Police, as appropriate) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed by Governors' Pastoral Group to ensure the School's safeguarding arrangements are sufficiently robust to e and is regularly revised as needed. When a child leaves the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue

supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

If staff are concerned that there is an immediate/significant risk of a child being drawn into terrorism, any member of staff may make a referral directly to Children's Social Care or the Police and update the DSL accordingly.

Visiting Speakers

The School ensures that visiting speakers are appropriately supervised and suitable. The School is conscious of its responsibility to ensure students can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy.

The Headmaster will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances which may include a DBS check.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of a visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the school site, will be supervised by a member of staff. On arrival at the School, visiting speakers will be required to show original current identification.

Children Missing From Education

A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education from the School can act as a vital warning sign to a range of safeguarding issues, such as neglect, and child sexual and/or criminal exploitation, particularly county lines, radicalisation, FGM or forced marriage. It is important that the School's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of becoming a child missing education in the future. Unauthorised absences from School will be managed in accordance with the School's Attendance Policy.

The School will carefully monitor all student absences from School and promptly address concerns about irregular attendance with the parent/carer. The School works closely with Education Social Work Service where any patterns of absence cause concern.

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

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are absent from school, particularly repeatedly and/or for prolonged periods, and children missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, exploitation neglect or radicalisation.

A student who fails to attend School regularly, or has been absent from School without the School's permission for a continuous period of 10 school days or more will be reported to Warwickshire County Council's Children Missing Education (CME) Service (carolhattee@warwickshire.gov.uk or 01926 742036) . For further details on when the School has a duty to report to the local authority, please see the Attendance Policy.

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the statutory DfE guidance '*Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)*'.

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.

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. The School provides outdoor-safety guidance focussed on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child Sexual Exploitation (CSE)

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

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

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

The Child Criminal Exploitation (CCE) indicators (see section below) can also be indicators of CSE, as can:

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

Sexual exploitation 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 CCE, the trafficking of children and/or county lines as well as other forms of abuse.

The School teaches children about the risks of sexual exploitation and that consent cannot be given even where they are voluntarily engaging in sexual activity with the person exploiting them. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse. Staff are also aware that child sexual exploitation does not always involve physical contact and can happen online.

All staff are made aware of the indicators of sexual exploitation of children and all concerns should be reported immediately to the DSL. The DSL will consider the need to make a referral to Children's Social Care as with any other child protection concern and with particular reference to WSCE Child Sexual Exploitation procedures.

Following a referral to Children's Social Care, a Multi-Agency Sexual Exploitation (MASE) meeting may be convened under WSCE inter-agency safeguarding procedures. The School will attend and share information at MASE meetings as required. Parents and young people will be invited to attend MASE meetings by Children's Social Care as appropriate.

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>. The Children's Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

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

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too.

It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

Children who have been exploited will need additional support to help maintain them in education.

County lines

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

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

As with other forms of abuse, county lines exploitation can affect any child. It can also still be exploitation even if the child believes they have consented. It can sometimes involve force or violence (or threats thereof), can be perpetrated by groups or individuals, but is always typified by some form of power imbalance whether that be financial, physical strength, status or gender.

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

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, the perpetrator or alleged perpetrator of serious violence (e.g. knife crime).

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals.

If a member of staff is concerned they should speak to the DSL. A referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. 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 National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2025)*".

Cybercrime

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.

- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

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

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

Additional advice can be found at: Cyber Choices, ‘*NPCC- When to call the Police*’ and National Cyber Security Centre - [NCSC.gov.uk](https://www.ncsc.gov.uk).

So-Called ‘Honour Based’ Abuse (‘HBA’)

So-called ‘honour-based’ abuse (HBA) encompasses crimes which 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’. Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA. 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.

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 (including at risk of FGM) 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.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or have already taken place can be found at pages 38-41 of the multi-agency statutory guidance on FGM. Example indications that FGM has already taken place may include:

- A student may have difficulty walking, sitting or standing and may look uncomfortable
- A student may have frequent urinary, menstrual or stomach problems, or spend longer in the toilet due to difficulties urinating
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on their return
- A student is reluctant to undergo medical examination

From October 2015, section 5B of the Female Genital Mutilation Act 2003 placed a statutory duty on teachers (along with social workers and healthcare professionals) to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. If a teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy.

If staff have concerns that FGM has taken place, as well as reporting this to the Police, they should also activate local safeguarding procedures using existing and national and local protocols. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate.

Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation: procedural information (<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>)

Forced marriage

All staff should be aware that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is

to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023). Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: contact: 020 7008 0151 or email fm@fcdo.gov.uk.

As with other forms of HBA, if staff have concerns that a child may be at risk of a forced marriage, or that such marriage has already taken place, they should discuss any concerns with the DSL who will activate local safeguarding procedures and involve children's social care as appropriate.

Special Educational Needs and Disabilities (SEND) and Certain Health Conditions

The School recognises that some children are more vulnerable to abuse, neglect, exploitation and bullying. Children with SEND or certain health conditions can face additional safeguarding challenges. The School has put in extra pastoral support for those children.

All staff need to be alert to the specific needs of vulnerable students. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

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

Looked After Children

All staff members are alerted to the particular potential vulnerabilities of Looked After Children. The DSL is responsible for liaising with virtual school heads for Looked After Children in the School and is responsible for promoting the educational achievement of children who are Looked After. The School promotes the educational achievement of all students including those who are Looked After and will ensure that all staff have the skills, knowledge and understanding necessary to keep Looked After/Previously Looked After children safe.

Lesbian, Gay, Bisexual or Gender Questioning

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm however, the School recognises that children that are LGBT can sometimes be targeted by other children. In some cases a student who is perceived by their peers to be lesbian, gay or bisexual (whether or not that is the case) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the students' individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE) the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Staff will be alert to issues and will support students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing with the DSL where appropriate. Issues will be dealt with under this policy and the School's behaviour policy, where appropriate.

Domestic abuse

The Domestic Abuse Act 2021 introduces a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition encompasses a wide range of different abusive behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Staff should be vigilant to any signs or indicators of domestic abuse and be mindful that domestic abuse may lead to other safeguarding concerns. Any concerns should be discussed with the DSL, and should be managed under this policy.

Operation Encompass

The School is part of Operation Encompass which is a national police and education early intervention safeguarding partnership which supports children who experience domestic abuse. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL (also known as the Key Adult) in School before the child or children arrive at school the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1 pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The School's DSL has completed the National Online Operation Encompass Key Adult training. All staff are encouraged undertake the online training. The DSL will provide training for all staff and Governors about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children. Our parents are fully aware that we are an Operation Encompass setting, and we ensure that when a new child joins the School the parents/carers are informed about Operation Encompass.

The Safeguarding Governor reports on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

Homelessness

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School is aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspects that a student may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website. The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate and will be mindful of the additional support that a child going through this process may require in accordance with this policy.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. The School will ensure that children are adequately supported and that any concerns are raised with the DSL.

Children who need a social worker (Children in Need and Child Protection Plans)

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

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

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

Children who need mental health support

The School has an important role to play in supporting the mental health and wellbeing of its students. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our students.

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

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

The School can access a range of advice to help identify children in need of extra mental health support which includes working with external agencies. More information can be found in the Mental health and behaviour in schools guidance published by the DfE. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or DDSL.

11. ONLINE SAFETY

Online safety (including when children are online at home) is an integral part of the School's curriculum. The School ensures that all students are taught about safeguarding, including online, through the curriculum and PSHE to help children adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

The School will ensure that:

- appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's firewall provides the filtering and Securus is used for monitoring. These systems reduces the risk of children being exposed to illegal, inappropriate or potentially harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (content risk); reduces the risk of children being subjected to harmful online interaction with others including commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes (contact risk); restricts access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (commerce risk); and helps manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying (conduct risk).
- staff are equipped with the knowledge to safeguard children online by attending online safety training including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Staff found in breach of School rules regarding online safety may be subject to disciplinary action.

The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

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

The School ensures compliance with the DfE's 'Cyber security (filtering and monitoring) standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The School has regard to the DfE's guidance 'Generative AI: product safety expectations' when considering how the filtering and monitoring arrangements in place apply to the use generative AI within education. The School ensures that any Generative AI products effectively and reliably prevent access to harmful and inappropriate content by students by:

- integrating the highest standards of filtering possible within the product
- using additional filtering solutions that work on top of an AI product
- the safe use of AI is covered in the School's Teaching and Learning policy

The School's E-Safety Policy sets out the School's approach to online safety including how the School helps students stay safe online and also includes the School's policy on the use of mobile and smart technology in school, including the School's management of the associated risks through filtering and monitoring arrangements. These policies and systems are reviewed periodically.

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

12. USE OF IMAGES

In accordance with the School's data protection obligations the School will seek consent from students (and their parents, where appropriate) to the use of a student's image e.g. on the website or School publications. The School will only use a student's first name with a digital image and will always ensure students are appropriately dressed. All students are encouraged to tell the School if they are worried about any photographs that are taken of them.

The School's policy on the use of student images is contained in the Staff Handbook which staff must follow at all times.

13. MANAGING SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The School's procedures for dealing with concerns or allegations against any staff member (including supply staff, volunteers and contractors who work with children) aim to both protect children from abuse and to support staff who are the subject of allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The School will liaise with the LADO, Police and Social Services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Headmaster) volunteers and contractors follow Departmental guidance and WCSB arrangements and apply when staff, including volunteers and contractors, have (or are alleged to have):

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

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

An allegation made against teachers and other staff (including volunteers and contractors who work with children) must be reported immediately to the Headmaster. Should the initial allegation first be made to any other member of staff then that member of staff must either request the person raising the allegation to report it to the Headmaster or if that is not possible to pass details of the allegation to the Headmaster immediately. Should the allegation be against the Headmaster or a School Governor the report should be made to the Chair of Governors (without the Headmaster or School Governor being informed first). It will be the Chair's responsibility to contact the LADO. Should the allegation of abuse concern the DSL, the report should be made to the Headmaster without informing the DSL.

Allegations against a teacher that is no longer teaching should be referred to the Police. Non-recent allegations of abuse should also be referred to the Police and also to the LADO. Non-recent

allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the Police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake its own investigation of the allegation/s without prior consultation with the LADO or, in more serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis. When dealing with allegations about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

The case manager (i.e. the Headmaster or the DSL) should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children, or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact Children's Social Care and as appropriate involve the Police immediately). All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or Children's Social Care. The DSL is responsible for ensuring the child is not at risk.

Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to Children's Social Care.

When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or Children's Social Care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The case manager should give careful consideration as to whether the circumstances warrant suspension from contact with children

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

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

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

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, Working Together guidance and KCSIE when making a decision (including with respect to considering alternatives). The reasons and justification for suspension will be recorded and the staff member informed of the decision within one working day. The School recognises it has a duty of care to its staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of the likely course of action and progress of the case and to consider what other support is available and appropriate for the individual and potentially their family.

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff

at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

The case manager will ensure that the victim's parents are informed as soon as possible and kept informed regarding the progress of the case, subject to any advice from Children's Social Care and/or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

During the course of the investigation the School, in consultation with the LADO, will also decide what information should be given to all parents, staff and other students and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in KCSIE relating to reporting restrictions identifying teachers who are the subject of allegations from students. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made). If it is established that the allegation is malicious or false, no details of the allegation will be retained on the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

All students who are involved will receive appropriate support.

Staff should have regard to the Staff Handbook to minimise the risk of allegations being made.

On conclusion of a case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS. Further information on this can be found below in the External Referrals section.

14. MANAGING SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST SUPPLY STAFF AND CONTRACTORS

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

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

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

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

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

15. MANAGING SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

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

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

The School will ensure that the DSL or DDSLs can be contacted and/or are available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The School's DSL, Mr Christopher Dunford, can be contacted at cd@kes.net.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (last updated September 2023).

16. DEALING WITH CONCERNS OR ALLEGATIONS THAT DO NOT MEET THE HARMS THRESHOLD

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

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

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small- about their own or another member of staff's behaviour.

The School's code of conduct can be found in the Staff Handbook. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place students or staff at risk of harm or of allegation of harm to a student. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. The Headmaster is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Headmaster without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Headmaster, it should be referred to the Chair of Governors.

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

If a concern is raised by a third party, the Headmaster will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the school is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Headmaster will consult with the LADO and take a more collaborative decision-making approach.

17. WHISTLEBLOWING

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm may be dealt with in accordance with the School's Managing Allegations of Abuse against Staff procedure. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feels that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

18. EXTERNAL REFERRALS

The School follows Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to promptly refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Furthermore, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School will consider making a referral to the Teaching Regulation Agency (TRA) as required by sections 141D and 141E of the Education Act 2002 and a prohibition

order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The Secretary of State may investigate the case, and if she/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

Any non-recent allegations of child abuse made against a member of staff who is no longer at the School will be reported to the Police. All allegations of historical abuse should also be referred to the Headmaster straightaway.

19. STUDENT'S WISHES

Where there is a safeguarding concern the School will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by regular consultation with the student concerned. The School will operate processes with the best interests of the student at their heart.

20. PARENTS

Parents have an important role in supporting the School. A copy of this policy is on our website and our other policies relating to issues of child protection (such as E-safety) and we hope that parents will always feel able to take up any issues or worries that they may have with the School. Any allegations of child abuse or concerns reported to the School about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. However, it may not always be appropriate to inform parents of safeguarding concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may however contact OFSTED directly if they wish (<https://contact.ofsted.gov.uk/online-complaints-schools>).

21. PROMOTING AWARENESS

We recognise that the School plays a significant part in the prevention of harm to students by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our students and recognise the role the School plays in recognising and protecting our students who may be susceptible to, for example, radicalisation or extremist views.

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our students. All teaching staff play a vital role in this process, helping to ensure that all students relate well to one another and feel safe and comfortable within the School. We expect all the teaching staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our students on issues relating to health, safety and well-being. All staff, including support staff, have an important role in insisting that students always adhere to the standards of behaviour set out in our Behaviour Policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Across the curriculum, in assemblies, drama and on activities and trips we promote tolerance and mutual respect and understanding.

All students know that there are adults to whom they can turn to if they are worried, including the School Counsellor, Tutors, Heads of School and Compass, the School Nurse Service. Our support to students includes the following:

- Every child has access to guidance on where to turn for advice
- Notices in public spaces and in toilets provide advice on where students can seek help
- We operate a mentoring scheme whereby trained older students are encouraged to offer advice and support to younger students
- An external agency leadership training to our mentors which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable students
- We provide regular lessons to students on E-safety and ensure that all students understand and adhere to the School's guidelines in this area. This includes guidance on educating students to stay safe including e-safety and online protection. For more details on cyber-bullying and e-safety please refer to the School's Anti-Bullying and E-Safety Policies.

22. RELATIONSHIPS AND SEX EDUCATION ("RSE")

The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The School's RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships, including PSHE and Personal Development that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The School focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The School recognises that discussions about sensitive topics in RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a student is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RS. The School's /RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the School will use. The School proactively engages and consults parents in the development and review of this policy. Parents are informed of their right to request that their child is withdrawn from sex education.

23. OTHER ARRANGEMENTS

The School may arrange for students to stay with a host family, during a foreign exchange trip or sports tour, for example. In such circumstances the School will, in accordance with Annex D of KCSIE, ensure, as far as reasonably possible, that hosting arrangements are safe. The following guidance aims to help ensure the safety of our students on trips involving hosting:

1. Overseas partners are asked to confirm in writing that there are no safeguarding concerns over families with whom our students will stay during residential visits.
2. Where a visit is being arranged for the first time, or involves a significant number of new staff members, a preliminary visit should be carried out.
3. A risk assessment is undertaken (this may include length of the stay, knowledge of the family by any overseas partners and the age of the students). This risk assessment will document the risk factors identified and steps taken to reduce them.

4. Steps will be taken to reduce any risk identified (this may include ensuring students are seen by a member of staff every day while away from home, have access to a mobile phone with signal, and know who to contact, and how, if they have any concerns about their own safety).
5. Families and young people have been carefully matched and consideration given to, for example, gender, diet, religious belief, and special needs.
6. Hosting families are well known to the School and the host schools have identified no concerns about the suitability of the host family to care adequately for the visiting child.
7. The student will have his or her own bed in a room of someone of their own gender, or a separate bedroom. The student will have privacy whilst dressing, washing, and using toilet facilities. Contingency measures are in place if a child needs to move from the host family.
8. Parents are informed in writing of the steps taken to safeguard their children whilst being hosted, and are asked to sign that they understand that the School is not in a position to undertake any specific checks on the host parents.

Where the School has not been involved in making the arrangement but staff become aware that a student may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL. The School will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child. The School will also inform the Police if they have any reason to believe that the third party is failing to undertake a statutory duty.

The School may also arrange for foreign students to stay with a UK host family. In such circumstances, the School follows KCSIE which sets out that schools should request a DBS certificate (with the 'children's barred list' option checked) in respect of UK host families. Therefore, before hosting a foreign exchange student, the School will request that the responsible adult/s who resides in the UK host household must apply for an enhanced DBS certificate including a children's barred list check. This/these adult/s will undertake the responsibility to ensure the welfare and safety of the foreign student throughout their stay. The outcome of the DBS certificate must be considered to ensure there are no potential safeguarding risks to the students involved.

It is not a requirement that the School undertakes any checks on other members of the host family, but the School may consider it necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the student will be staying.

POSITION OF TRUST

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals; there is potential for exploitation and harm of vulnerable children and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Under the Sexual Offences Act 2003, it is also an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18 where that person is in a position of trust, even if the relationship is consensual.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer to the School's Staff Handbook.

24. RECORDS

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing and retained for as long as is necessary.

The School's records on child protection are kept securely using the digital platform CPOMS and are separated from routine student records. Access is restricted to the DSL, DDSL and the Headmaster and those authorised by the DSL, DDSL and Headmaster.

25. MONITORING AND EVALUATION OF THIS POLICY

The School monitors and evaluates its safeguarding policy and procedures through various mechanisms such as: Senior Leadership Team meetings; Pastoral Leadership Team meetings; meetings with Designated Governor; Full Governors' meetings; Governors' Pastoral Group meetings; School Council meetings; staff, parent and student surveys; scrutiny of attendance data and records bullying and student misconduct; and regular review of training offered to staff, including E-safety training.

Appendix 1: Vetting Checklist

(This table is to be used as guide only. All safer recruitment checks will take account of statutory guidance. Some roles will require the School to undertake a risk assessment to assess the vetting checks required including whether the individual will be engaging in regulated activity).

	ID Check/Sign in/out as	Full Name (Group 1ID)	Address (Group 2 ID)	DoB (Group 1 ID)	Reference(s)	Right to Work in UK (Group 1 ID)	Overseas Checks	Qualifications (Evidenced)	Enhanced DBS	Date of Barred List (List 99)	Prohibition from Management (section 128)	Prohibition from Teaching (Disqualified or Failed or Failed to Re-qualify)	Visitors Information Booklet (inc. Safeguarding Summary)	Safeguarding Policy	KCSIE (Whole)	KCSIE Part 1	KCSIE Part 2	KCSIE Annex A	KCSIE Annex B
Teaching Staff		x	x	x	x	x	x ¹	x	x	x	x	x		x		x			x
Support Staff		x	x	x	x	x	x ¹	x ²	x	x	x	x ³		x		x ⁶		x ⁶	x ⁶
SLT		x	x	x	x	x	x ¹	x	x	x	x	x ³		x	x ⁷	x			x
Non-Contracted Staff (e.g. self-employed invigilators, Private Music Teachers, Sports Coaches)	x ⁸	x	x	x		x	x ¹		x	x	x	x ³		x		x			
Members/Governors	x	x	x	x		x	x ¹		x	x	x	x ³		x	x ⁷		x	x	
Trustees	x												x						
Volunteers - Working in a <u>regulated</u> activity (i.e. with children on a regular basis or involved in a specified activity)	x ⁸	x	x	x		x	x ¹		x	x	x	x ³		x		x			x
Volunteers - Working an <u>irregular / occasional / temporary</u> basis (with or without children)	x ⁸												x						
Volunteers – Working on a <u>regular</u> basis but not with children	x ⁸	x	x	x					x	x ⁴	x	x ³	x						
Contractors - Working in a <u>regulated</u> activity (i.e. with children on a regular basis or involved in a specified activity e.g. Agency Staff, Warwickshire Music)	x ⁸	x	x	x	x ⁵	x ⁵	x ⁵	x ⁵	x ⁵	x ⁵	x	x ³		x		x			x
Contractors – Working on <u>irregular / occasional / temporary</u> basis (with or without children)	x ⁸												x						
Contractors - Working on a <u>regular</u> basis but not with children	x ⁸	x	x	x	x ⁵	x ⁵	x ⁵	x ⁵	x ⁵	x ^{4/5}	x	x ³	x						

¹ If relevant

² If qualifications are required for the position

³ To ensure other staff have not been banned from teaching.

⁴ If an opportunity for unsupervised contact with children

⁵ Confirmation obtained from employer

⁶ Annex A for identified non-teaching staff only.

⁷ Designated Safeguarding Governor and DDSL

⁸ For those attending in a professional capacity, ID is required on the initial visit if they are unknown to the reception/hosting member of staff.