

Safeguarding Policy and Procedures

(Including EYFS and Wrap-around care)

A Foundation Safeguarding Policy
Regulatory Policy

Version 3.15

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Safeguarding Policy and Procedures

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Safeguarding Policy and Procedures

1. POLICY STATEMENT, PRINCIPLES AND TERMINOLOGY

The Trustees and staff of The Princethorpe Foundation ('the Foundation') comprising Princethorpe College, Crackley Hall and Crescent School ('the Schools') fully recognise the contribution they must make to safeguarding children. We recognise that all staff, including volunteers, supply staff, trainee teachers, contractors and Trustees, have a full and active part to play in promoting children's welfare, protecting our children from harm and providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

This policy applies to all pupils in the Foundation, including those in the Sixth Form over the age of 18 and those in the Early Years Foundation Stage. The term 'child' is used within this policy to reflect the terminology in relevant legislation, but the principles of safeguarding apply to those no longer under the age of 18, but still a pupil, although how this is applied may vary slightly, for example due to differences in legislation and social care for children and adults..

Safeguarding is everyone's responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this Policy.

Related Safeguarding Policies

This policy is one of a series in the Foundation's integrated safeguarding portfolio. The following policies are related to or mentioned in this policy and should be read in conjunction with this policy:

- Educational Trips Policy;
- Health and Safety Policy;
- Safer Recruitment Policy;
- Images of Pupils Policy;
- IT Acceptable Use Policy;
- Behaviour Management Policy;
- Missing Child Policy;
- Attendance Policy;
- Staff Code of Conduct;
- Whistleblowing Policy;
- Intimate Care Policy;
- Anti-Bullying and Harassment Policy.

This Policy applies to all the Schools in the Foundation. This Safeguarding Policy is available on each of the School's websites and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work for the Foundation. Unless stated otherwise, this policy applies to all staff.

Core safeguarding principles

The Foundation is committed to all children experiencing success in their learning because their welfare is promoted, and they feel safe.

Therefore, the Foundation's core safeguarding principles are:

- all children have equal rights to protection from harm;
- all staff, pupils, trustees, volunteers and parents will be committed to the safeguarding of pupils;
- all staff have equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is at risk of harm in the community or in school in accordance with this Safeguarding Policy;

- all staff share responsibility to maintain an attitude of 'it could happen here' where safeguarding is concerned;
- if there is a concern about the welfare of a child, staff members will act in the interests of the child;
- pupils and staff involved in safeguarding issues will receive appropriate support;
- representatives of the whole Foundation community will be involved in the development and review of this Safeguarding Policy.

Terminology

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 the impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Child protection refers to the processes 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 and in kinship care, foster or residential care.

Staff refers, unless otherwise stated, to all those working for or on behalf of the Foundation (including supply staff), full time or part-time, temporary or permanent, in either a paid, training or voluntary capacity.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults with parental responsibility or those who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Staff means any individual who works in or on behalf of the Foundation, whether on a paid or unpaid basis, and includes:

- all employees, including teaching staff and support staff;
- supply staff and agency workers, whether engaged directly or through a third-party agency;
- volunteers;
- casual workers;
- contractors;
- peripatetic staff and other specialists who provide services to pupils on the School's premises or at school-organised activities;
- trainee teachers, apprentices, student placements, and other individuals undertaking initial teacher training or work experience at the School; and
- governors, trustees and proprietors.

Early Help is increasingly used in national policy to describe support provided to children and families through universal and community-based services as soon as needs or problems emerge. In Warwickshire, early intervention is referred to as Early Support, which may increase to Targeted Early Support where additional coordinated support is needed. Where statutory intervention is required, children may receive Family Help support as children in need under section 17 of the Children Act 1989, or the local authority may make section 47 enquiries where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

2. SAFEGUARDING LEGISLATION AND GUIDANCE

This Policy has regard to the following guidance and advice:

- Keeping Children Safe in Education ('KCS/E') (September 2026)
(Staff can find a copy on the Princethorpe Staff Handbook and on Teacher Shared on the Intranet at Crackley Hall and Crescent School (a hard copy has been issued to all staff).)
- Disqualification under the Childcare Act 2006 (September 2018)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015).
A copy of this document can be found in the DSL's office at Princethorpe, Crackley Hall and Crescent School.
- Working Together to Safeguard Children (March 2026) ('WT')
- Information sharing: advice for practitioners providing safeguarding services (May 2024)
- Prevent Duty Guidance for England and Wales (March 2024)
- The Prevent Duty: an introduction for those with safeguarding responsibilities (September 2023)
- *How social media is used to encourage travel to Syria and Iraq* (July 2015)
- The use of social media for on-line radicalisation (July 2015)
- Relationships education, relationships, and sex education (RSE) and health education (July 2025)
- Behaviour in schools (February 2024)
- Working together to improve school attendance (July 2026)
- Children Missing Education (September 2025)
- After- school clubs, community activities and tuition: safeguarding guidance for providers (September 2023)
- Digital and technology standards in schools and colleges (August 2026)
- Mobile phones in schools (June 2026)
- *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (February 2026)
- Safeguarding and protecting people for charities and trustees (June 2022), Charity Commission guidance
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- Restrictive interventions, including use of reasonable force, in schools (December 2025)
- Data Protection in Schools guidance (April 2024)

The Foundation's procedures for safeguarding children take account of the procedures and practices of Warwickshire County Council as part of the inter-agency safeguarding procedures set up by Warwickshire Safeguarding Children Executive. Warwickshire Safeguarding ('WS') advice and guidance which can be found at <https://www.safeguardingwarwickshire.co.uk/>. All the schools may also need to refer children to other safeguarding children's boards as many children reside in areas outside of Warwickshire.

3. KEY CONTACTS

Key personnel - Princethorpe College

Designated safeguarding lead (DSL)

- **Adam Rickart** Designated Safeguarding Lead (DSL)
 - Email: adamrickart@princethorpe.co.uk
 - Phone: 01926 634200 or 07391 407551

Deputy designated safeguarding leads (DDSL)

- **Anne Allen** Deputy DSL
 - Email : annewhite@princethorpe.co.uk
 - Phone: 01926 634200
- **Andy Compton** Deputy DSL
 - Email: andycompton@princethorpe.co.uk
 - Phone: 01926 634200 or 07741 198866
- **Ben Collie** Deputy DSL
 - Email: bencollie@princethorpe.co.uk
 - Phone: 01926 634200
- **Cyp Vella** Deputy DSL
 - Email cyprianvella@princethorpe.co.uk
 - Phone: 01926 634200
- **Faye Roberts** Deputy DSL
 - Email fayeroberts@princethorpe.co.uk
 - Phone: 01926 634200
- **Grove du Toit**, Head, Deputy DSL
 - Email : grovedutoit@princethorpe.co.uk
 - Phone: 01926 634200
- **Jess Newborough** Deputy DSL
 - Email: jessicanewborough@princethorpe.co.uk
 - Phone: 01926 634200
- **Michael Spencer**, Deputy Headteacher Academic
 - Email: Michaelspencer@princethorpe.co.uk
 - Phone: 01926 634200
- **Naomi Chard**, Deputy DSL
 - Email: naomichard@princethorpe.co.uk
 - Phone: 01926 634200
- **Neil McCollin** Deputy DSL
 - Email: neilmccolin@princethorpe.co.uk
 - Phone: 07980 309725
- **Louisa Fielding** Deputy DSL
 - Email: louisafielding@princethorpe.co.uk
 - Phone: 01926 634231

Nominated Safeguarding Trustees

- Mrs Sally Rosser: is the Nominated Safeguarding Trustee for Princethorpe
 - Email: sallyrosser@princethorpe.co.uk or NominatedSafeguardingTrustee@princethorpe.co.uk
 - Phone: 01788 521595

Deputy Nominated Safeguarding Trustees for Princethorpe:

- Mrs Kirstie Yuen:
 - Email: Kirstieyuen@princethorpe.co.uk or NominatedSafeguardingTrustee@crescentschool.co.uk
 - Phone: 01788 521595
- Mrs Barbara Forster:
 - Email: barbaraforster@princethorpe.co.uk or NominatedSafeguardingTrustee@crackleyhall.co.uk
 - Phone: 01788 531595

Senior Attendance Champion

The designated teacher for attendance:

- **Louisa Fielding** Deputy DSL
 - Email: louisafielding@princethorpe.co.uk
 - Phone: 01926 634231

Looked after children and previously looked after children

The designated teacher for children who are looked after by the local authority is:

- **Adam Rickart** Designated Safeguarding Lead (DSL)
 - Email: adamrickart@princethorpe.co.uk
 - Phone: 01926 634200 or 07391 407551

Early Help Lead

- **Adam Rickart** Designated Safeguarding Lead (DSL)
 - Email: adamrickart@princethorpe.co.uk
 - Phone: 01926 634200 or 07391 407551

Online Safety Officer

- **Adam Rickart** Designated Safeguarding Lead (DSL)
 - Email: adamrickart@princethorpe.co.uk
 - Phone: 01926 634200 or 07391 407551

Key personnel – Crackley Hall

Designated Safeguarding Lead (DSL)

- **Narelle Copland**, Assistant Head, Pastoral is the Designated Safeguarding Lead
 - Email: narellecopland@crackleyhall.co.uk
 - Phone: 01926 514444

Deputy designated safeguarding leads (DDSL)

- **Clare Bird** Deputy DSL, (Nursery Deputy Manager)
 - Email: clarebird@crackleyhall.co.uk
 - Phone: 01926 514444
- **Victoria Osborn** Deputy DSL, (Holiday Club Manager)
 - Email : victoriaosborn@crackleyhall.co.uk
 - Phone: 01926 514444
- **David Johnson** Deputy DSL, (Wraparound Care Supervisor)
 - Email : davidjohnson@crackleyhall.co.uk
 - Phone: 01926 514444
- **Rob Duigan**, Head, Deputy DSL
 - Email : robertduigan@crackleyhall.co.uk
 - Phone: 01926 514444

Nominated Safeguarding Trustees

- **Mrs Barbara Forster**,
 - Email : barbaraforster@princethorpe.co.uk
 - Phone: 01926 514444

Deputy Nominated Safeguarding Trustees for Crackley Hall:

- Mrs Sally Rosser:
 - Phone: 01788 521595
 - Email: sallyrosser@princethorpe.co.uk or nominatedsafeguardingtrustee@princethorpe.co.uk
- Mrs Kirstie Yuen:
 - Email: Kirstieyuen@princethorpe.co.uk or NominatedSafeguardingTrustee@crescentschool.co.uk
 - Phone: 01788 521595

Senior Attendance Champion

The designated teacher for attendance:

- **Narelle Copland**, Assistant Head, Pastoral, DSL
 - Email: narellecopland@crackleyhall.co.uk
 - Phone: 01926 514444

Looked after children and previously looked after children

The designated teacher for children who are looked after by the local authority is:

- **Narelle Copland**, Assistant Head, Pastoral, DSL
 - Email: narellecopland@crackleyhall.co.uk
 - Phone: 01926 514444

Early Help Lead

- **Narelle Copland**, Assistant Head, Pastoral, DSL
 - Email: narellecopland@crackleyhall.co.uk
 - Phone: 01926 514444

Online Safety Officer

- **Narelle Copland**, Assistant Head, Pastoral, DSL
 - Email: narellecopland@crackleyhall.co.uk
 - Phone: 01926 514444

Key personnel – Crescent School

Designated safeguarding lead (DSL)

- **Alan Webb**, Assistant Head, who is Designated Safeguarding Lead (DSL)
 - Email: alanwebb@crescentschool.co.uk
 - Phone: 01788 521595 or 07741 305914

Deputy designated safeguarding leads (DDSL)

- **Matt Aston**, Head, Deputy DSL
 - Email : mattaston@crescentschool.co.uk Phone: 01788 521595
- **Sam Stapleton**, Head of Wellbeing, Deputy DSL
 - Email: samstapleton@crescentschool.co.uk
 - Phone: 01788 521595

Nominated Safeguarding Trustees

- **Mrs Kirstie Yuen** is the Nominated Safeguarding Trustee for Crescent School
 - Email: Kirstieyuen@princethorpe.co.uk or NominatedSafeguardingTrustee@crescentschool.co.uk
 - Phone: 01788 521595

Deputy Nominated Safeguarding Trustees for Crescent School:

- Mrs Barbara Forster:
 - Telephone: 01788 531595
 - Email: barbaraforster@princethorpe.co.uk or NominatedSafeguardingTrustee@crackleyhall.co.uk
- **Mrs Sally Rosser**: is the Nominated Safeguarding Trustee for Princethorpe
 - Email: sallyrosser@princethorpe.co.uk or NominatedSafeguardingTrustee@princethorpe.co.uk

Senior Attendance Champion

The designated teacher for attendance:

- **Alan Webb**, Assistant Head and Designated Safeguarding Lead (DSL)
 - Email: alanwebb@crescentschool.co.uk
 - Phone: 01788 521595 or 07741 305914

Looked after children and previously looked after children

The designated teacher for children who are looked after by the local authority is:

- **Sam Stapleton**, Head of Wellbeing, Deputy DSL
 - Email: samstapleton@crescentschool.co.uk
 - Phone: 01788 521595

Early Help Lead

- **Alan Webb**, Assistant Head, DSL
 - Email: alanwebb@crescentschool.co.uk
 - Phone: 01788 521595 or 07741 305914

Online Safety Officer

- **Alan Webb**, Assistant Head, DSL
 - Email: alanwebb@crescentschool.co.uk
 - Phone: 01788 521595 or 07741 305914

Key external agencies

Local safeguarding partners:

Warwickshire County Council (Chief Executive), Clinical Commissioning Group (Accountable Officers) and Warwickshire Police (Chief Constable).

Covers Leamington Spa, Rugby, Stratford upon Avon and Nuneaton and Bedworth.

LADO Warwickshire: lado@warwickshire.gcsx.gov.uk or 01926 410410

Cross border CP cases: <http://apps.warwickshire.gov.uk/api/documents/WCCC-850-45>

Warwickshire: 01926 410410

Other areas:

Coventry: 02476 788555

Oxfordshire: 01865 815843

Northamptonshire: 03001 261000

Leicestershire: 0116 305 0005

Children Missing Education Service

The Children Missing Education Service (CME) for Warwickshire

Tel: 01926 742036

Email: carolhattee@warwickshire.gov.uk

Multi-Agency Safeguarding Hub Warwickshire MASH –

Tel: 01926 414144

Email: mash@warwickshire.gcsx.gov.uk

The form can also be completed online.

Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team: 01926 886922.

NSPCC whistleblowing helpline

Address: Weston House, 42 Curtain Road London EC2A 3NH

Tel: 0800 028 0285 between 8.00am and 8.00pm Monday to Friday

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

Address: DBS Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF

Tel: 03000 200 190

Email: customerservices@db.s.gov.uk

Teaching Regulation Agency

Address: Teacher Miscount, Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT

Tel: 0207 593 5393

Email: TRA.Caseworker@education.gov.uk

OFSTED Safeguarding Children

Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm)

Email: enquiries@ofsted.gov.uk

Preventing extremism in schools and children's services

Department for Education:

Tel non-emergency number: 020 7340 7264

Email: counter.extremism@education.gov.uk

Police:

Emergency: 999

Non-emergency: 101

Local authority:

Prevent Lead: Geoff Thomas

Tel: 01926 412016

Email: geoffthomas@warwickshire.gov.uk

4. ROLES AND RESPONSIBILITIES

The Designated Safeguarding Lead (DSL)

The DSL's role is to take lead responsibility for safeguarding and child protection matters in their respective school. The DSL's responsibility is to maintain an overview of safeguarding, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the Police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the Foundation's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the school has in place. The DSL must keep detailed, accurate and secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The DSL will understand relevant data protection legislation and regulations, with particular emphasis on the Data Protection Act 2018 and the UK General Data Protection Regulation ('UK GDPR'). In addition the DSL will have due regard to the DfE's Data Protection Guidance for schools. The DSL will be equipped to understand the importance of information sharing, both within the school and with other schools/colleges on transfer (including in year and between primary and secondary education), and with safeguarding partners, other agencies, organisations and practitioners. Where a pupil leaves the school, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

This includes sharing information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme, as well as information relating to serious violence or harmful sexual behaviours. It would be good practice for a conversation to take place between the DSLs at both settings, where there are issues or concern.

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

During term time, the DSL and/ or a Deputy Designated Safeguarding Lead ('DDSL') will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted using their mobile phone (where provided above). For out of hours/out of term activities, the DSL or DDSL will be available via the emergency phone number published on the school website and contact details of the DSL will be shared with the MASH.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WT. "NPCC - When to call the Police"* can assist the DSL or DDSL understand when they should consider calling the Police and what to expect when they do.

The DSL or DDSL will also be responsible for liaising with the senior mental health lead where safeguarding concerns are linked to mental health.

The DSL (and DDSLs) 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.

Whilst the Head should ensure that the policies and procedures adopted are understood and followed by all staff, and the Trustees are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this lead responsibility should not be delegated.

*Please see **Section 3, Key Contacts** for contact details at the local authority. Full details of the DSL's role can be found at Annex B of KCSIE.*

The Deputy Designated Safeguarding Leads (DDSLs)

DDSLs are the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times. The DDSLs are trained to the same level as the DSLs and in the absence of the DSL, carry out those functions necessary to ensure the on-going safety and protection of pupils. For the avoidance of doubt, whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

In the event of the long-term absence of the DSL, the DDSLs will assume all of the functions of the DSL.

During school holidays or at any other time where the DSL may not be available or easily contactable, each school will have a rota of deputy DSLs who can serve as initial or supplementary points of contact. This will be shared with the local authority as requested.

The Trustees

The Trustees have overall responsibility for facilitating a whole school approach to safeguarding. The Trustees ensure there are appropriate policies and procedures in place (which are transparent, clear and easy to understand for staff, pupils, parents and carers) in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, which are in accordance with government guidance and reflects the local criteria for action and the local protocol for assessment. This includes ensuring that the Foundation's safeguarding policies are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learned. A review also includes the effectiveness of procedures and their implementation.

The Trustees have designated trustees with specific responsibilities for safeguarding and related areas, in order to provide strategic oversight, support and challenge to the Schools leadership. These designated roles include:

- **Nominated Safeguarding Trustee(s):** The Nominated Safeguarding Trustee(s) takes a lead role at board level in championing safeguarding and child protection across the Foundation. Their responsibilities include liaising regularly with the DSL to maintain oversight of safeguarding activity; reviewing and challenging the effectiveness of safeguarding policies and procedures; ensuring that the annual review of this policy is carried out and that safeguarding remains a standing agenda item at governing body meetings; monitoring safeguarding training compliance for staff and Trustees; and reporting to the full board on safeguarding matters at least termly. The Safeguarding Trustee(s) receive enhanced safeguarding training to enable them to provide informed strategic challenge and is familiar with the local multi-agency safeguarding arrangements.

- **{SEND Trustee:** Mrs Sally Rosser is the designated SEND Trustee. They provide strategic oversight of the Foundations provision for pupils with special educational needs and disabilities, with particular regard to the additional safeguarding challenges that children with SEND can face. The SEND Trustee. liaises regularly with the SENCO to ensure that safeguarding considerations are fully integrated into the Foundation;s SEND provision and that staff are equipped to recognise and respond to safeguarding concerns involving children with SEND.}
- **{Online Safety Trustee: Mrs Sally Rosser** is the designated Online Safety Trustee. They provide board-level oversight of the Foundation's approach to online safety, including filtering and monitoring systems, cyber security arrangements, the safe use of generative AI, and the Foundation's response to online safeguarding incidents. The Online Safety Trustee liaises regularly with the DSL and relevant IT staff to ensure that the online safety arrangements are robust, proportionate and regularly updated to reflect the rapidly evolving nature of technology and online risks, including risks arising from generative AI.}

All Trustees with designated safeguarding-related roles receive appropriate induction and ongoing training relevant to their area of responsibility. They work collaboratively to ensure that the board maintains effective strategic oversight of safeguarding across the Foundation, and they report to the full board of Trustees on their respective areas at least termly

The Head

The Head of each of the Schools:

- ensures, together with the DSL, that the Safeguarding Policy and procedures are understood and implemented by all staff;
- allocates sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the DSL and DDSLs to carry out their roles effectively;
- supports the designated teacher for looked after (and previously looked after) children to promote the educational achievement of any pupils who are looked after by the local authority and ensures that all staff have the skills, knowledge and understanding necessary to keep looked after children safe;
- ensures that all staff understand the whistleblowing procedures and where to find these;
- ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe at all times including online as part of a broad and balanced curriculum to include Relationships and Sex Education;
- manages all allegations of abuse against staff in accordance with the procedures in this Policy.

5. STAFF CODE OF CONDUCT

The aim of the **Staff Code of Conduct** is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with Code of Conduct at all times. A hard copy is issued to all staff during their induction, and it can also be found in the **Staff Handbook**.

Staff sign annually to say they have read and understood the **Staff Code of Conduct**.

Staff also receive advice regarding personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules. (Please also refer to the **ICT Acceptable Use Policy** for staff & pupils.)

Staff found to be in breach of the **Staff Code of Conduct** may the subject of a referral to the Designated Officer in the local authority and may be subject to disciplinary action.

6. ABUSE OF POSITION OF TRUST

All Foundation staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is 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. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

7. SAFER RECRUITMENT

The Foundation is committed to safer recruitment processes and ongoing safer working practices to create a culture that safeguards and promotes the welfare of children in the Schools whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the Schools.

Members of teaching and non-teaching staff including part-time staff, trainee teachers, 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, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the Schools may undertake an online update check through the DBS Update Service.

In relation to the Foundation's nursery provision, all staff and prospective staff are informed that they have an ongoing obligation to disclose any information that may affect their suitability to work with children. This includes, but is not limited to, any cautions, convictions, relevant orders, or any other matter that may affect their suitability. This requirement is communicated at the point of recruitment and is reiterated to existing staff at regular intervals.

Furthermore, in respect of staff working in, or having unsupervised contact with children in, the Foundation's early years provision, an enhanced DBS disclosure and barred list check must be obtained before the individual starts work or begins volunteering. No individual may commence work or volunteering in the early years provision until the results of both the DBS disclosure and barred list check have been received and are satisfactory.

As part of the shortlisting process, the Foundation will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the Foundation may want to explore with an applicant at interview. This forms part of the Foundation'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.

*Full details of the Foundation's safer recruitment procedures for checking the suitability of staff, Trustees and volunteers to work with children and young people are set out in the **Safer Recruitment Policy**. This Policy sets out the procedures from beginning to end of the process for recruiting all staff including details of the required checks. This Policy can be found on each School's website.*

8. ARRANGEMENTS FOR VISITING SPEAKERS

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

The Schools 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 and may include a DBS check if relevant. The Schools may also conduct research on the visiting speaker and/or their organisation, as appropriate. The Schools will not use a visiting speaker where any link is found to extremism, such as extremist groups and movements.

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 the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on school site, will be supervised by a school employee. At no point will a visiting speaker be left unsupervised on school site whilst pupils are present. A member of school staff will be present during the talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the Foundation and British values.

On attending the school, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. Visiting speakers will also be briefed on the Foundation's Safeguarding Policy and should confirm to the relevant school that they have the appropriate DBS check (unless the visiting speaker's employers have already confirmed that their staff have had the appropriate checks). The school shall also keep a formal register of visiting speakers retained in line with its **Data Protection Policy**.

The Foundation's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out on the OFS when booking a visiting speaker.

9. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children are more vulnerable to abuse neglect and exploitation than others. Those who may be particularly vulnerable include those children who are:

- disabled or have special educational needs;
- affected by parental substance misuse, domestic abuse or parental mental health needs;
- asylum seekers;
- looked after (or previously looked after) by the local authority or otherwise living away from home;
- vulnerable to being bullied, or engaging in bullying behaviours;
- living in temporary accommodation;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability sexuality or gender reassignment;
- at risk of child sexual or criminal exploitation;
- do not have English as a first language;
- at risk of 'honour' based violence, including female genital mutilation (FGM);
- at risk of forced marriage;
- absent from education for prolonged periods and/or on repeat occasions;
- at risk of being drawn into extremism through radicalisation.

This list is not exhaustive.

10. EARLY HELP AND FAMILY HELP

Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. The Foundation recognises that providing early help is more effective in promoting the welfare of children than reacting later. Any child may benefit from support before statutory intervention but all Foundation staff should be particularly alert to the potential need for additional support for a child who:

- is disabled, has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education care or from home;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, or is in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- has a parent or carer in custody, or is affected by parental offending;
- has been repeatedly removed from the classroom;
- is on a part-time timetable;
- is at risk of 'honour' based abuse such as FGM or Forced Marriage;
- is absent from education, on repeat occasions and/or for prolonged periods (including persistent absences for part of the school day); and
- is a privately fostered child.

Where a child's needs go beyond what universal early help services can address for example, where a child has multiple and/or complex needs, or where their circumstances make them more vulnerable the child may require targeted support through Family Help.

All school staff are trained to notice any concerns about children, which may help to identify that they would benefit from early help or Family Help. In the first instance, staff should discuss this with the school's DSL. If appropriate, the DSL will work with Warwickshire Safeguarding to undertake an assessment. Where the child's needs can be met through universal early help, the DSL will coordinate the School's response and liaise with relevant services. Where a child's needs are more complex and may require a multi-disciplinary Family Help assessment, the DSL will make a referral in accordance with Warwickshire Safeguarding Children Executive referral threshold document. Further guidance can be found in Working Together to Safeguard Children (March 2026) and the Families First Partnership Programme Guide.

The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help or Family Help is appropriate, the matter will be kept under review and consideration given to a referral to local authority children's social care if the child's situation does not appear to be improving or if concerns escalate.

*Please see **Section 3: roles and responsibilities for the individuals trained in the Early Help and Family Help process for each school.***

11. TEACHING CHILDREN HOW TO KEEP SAFE

The Trustees ensure that children are taught about safeguarding, including online safety, through teaching and learning opportunities to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation and extremism.

The Foundation plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The Foundation community will therefore:

- establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to, for example, through our Schools' pastoral support systems and ***Behaviour Management Policy***;
- ensure that all children know that they can approach any adult in each school if they are worried or in difficulty;
- provide Relationships Education to all primary age pupils and provide Relationships and Sex Education to all secondary age pupils. The Foundation understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, transphobia, biphobia, and sexual violence/harassment. Our Schools will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RE and RSE and will ensure the programme is fully inclusive and age and stage appropriate;
- include in the curriculum opportunities during the REAL time programme at Princethorpe and during assemblies, Form Teacher time or PSHE lessons at Crackley Hall and Crescent School to teach children about safeguarding and help them adjust their behaviours (both inside and outside of school), in order to reduce risks and build resilience, including to extremist ideology and radicalisation.

The Foundation recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach (to that outlined below) for more vulnerable children, victims of abuse and some SEND children or those with physical health issues might be needed.

Our approach is designed to help children to think about risks they may encounter and, with the support of staff, work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are therefore taught how to conduct themselves and how to behave in a responsible manner.

Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying. Children are also taught 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 people, especially children. It will also include teaching pupils, for example about health relationships, consent and that sexual violence and sexual harassment is always wrong. Further detail on the Foundation's approach to E-Safety is set out in **Section 19** below. That work will include discussions with children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sharing of nudes'. Reference to sharing of nudes includes sharing semi-nudes. It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic or sexual relationship and that she or he may do so without any intention to cause harm or distress to anybody. However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other

safeguarding concern. The Foundation's approach to sharing of nudes is set out in **Section 27** below.

12. ATTENDANCE

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Children being absent from education for prolonged periods and/or on repeat occasions, or where the absences are unexplainable, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines; attendance is therefore monitored closely. Our **Attendance Policy** is set out in a separate document and is reviewed regularly by the Trustees.

13. ELECTIVE HOME EDUCATION

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the Schools will inform the local authority and endeavor to coordinate a meeting with parents/carers where possible. Ideally, this would be before the parents' final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The Schools will inform the local authority of all deletions from the admissions register when a child is taken off roll.

14. PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify the local authority children's social care as soon as possible. When the Foundation becomes aware of a private fostering arrangement for a pupil that has not been notified to local authority children's social care, the school will encourage parents and private foster carers to notify local authority children's social care and will share information with local authority children's social care as appropriate.

15. FILTERING AND MONITORING

The Foundation has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the Foundation's IT system.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (content risk); reduce the risk of children being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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); restrict

access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual making or sharing nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes and/or pornography, sharing other explicit images and online bullying (conduct risk).

The Foundation 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 effectiveness of the filtering and monitoring provision at least annually. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT support. They will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The Foundation utilises the DfE's '*plan technology for your school*' service to self-assess compliance against the filtering and monitoring standards and ensures that any recommendations are incorporated as appropriate. The Foundation ensures that its filtering and monitoring arrangements addresses risks, including in relation to any generative AI tools used within the Foundation. Further detail of the Foundation's policy and procedures in relation to online safety can be found in Section 17 of this Policy and [● in the E-Safety Policy and Mobile Phone Policy which also includes detail on the use of mobile and smart technology in school, including the Foundation's management of the associated risks, and the Foundation's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the Foundation's systems.]

The Foundation will liaise with parents to reinforce the importance of children being safe online and the systems the Foundation 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 Foundation their child is going to be interacting with online.

16. USE OF AI

The Foundation recognises that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks in education. The Foundation is committed to ensuring that the use of AI is safe, ethical, transparent and aligned with the Foundation's safeguarding obligations. The Foundation's approach to AI safeguarding is embedded within the existing provisions of this policy, including in relation to filtering and monitoring, online safety, training and responding to specific safeguarding issues.

In line with KCSIE, the Foundation will take reasonable steps to identify, assess and manage risks associated with AI-generated content, including deepfakes, AI-generated sexual imagery, online exploitation, cyberbullying, impersonation, misinformation and other forms of

technology-facilitated abuse. Staff will receive appropriate safeguarding and online safety training to help them recognise and respond to AI-related concerns. Pupils will be supported to develop the knowledge and skills needed to use AI safely, responsibly and critically. Any safeguarding concerns involving AI or AI-generated content will be managed in accordance with the school's relevant policies, including the specific AI policy. The Foundation's [AI Policy] sets out further detail on the Foundation's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to that policy alongside the safeguarding procedures set out in this policy.

The Foundation will only use AI products that meet the DfE's *Generative AI: product safety expectations* and any use of generative AI by staff or pupils will be carefully considered and assessed, evaluating the benefits and risks within the Foundation's context.

The Foundation is alert to the safeguarding risks arising from AI, including but not limited to:

- the generation of deepfake images and AI-generated intimate imagery;
- the potential for AI chatbots to produce harmful, inaccurate, or age-inappropriate content;
- the risk of 'cognitive offloading' where pupils defer their critical thinking to AI tools; and
- the use of AI to facilitate grooming, exploitation, or the creation of child sexual abuse material.

Any safeguarding or wellbeing concern arising from the use of AI tools should be reported to the DSL immediately, using the procedures set out in this policy. This includes, but is not limited to, concerns about:

- a pupil creating, sharing, or being the subject of AI-generated intimate imagery (deepfakes)
- a pupil being exposed to harmful, inaccurate, or age-inappropriate content through an AI tool
- a pupil's personal data being compromised through the use of an AI tool
- a pupil interacting with an AI chatbot in a way that causes concern for their welfare or mental health
- a member of staff using AI in a way that may compromise pupil safety or data security.

The DSL will investigate any AI-related safeguarding concern and determine whether it should be referred to external agencies such as children's social care and/or the police, in accordance with the procedures set out in this policy.

17. USE OF MOBILE PHONES

The Foundation operates as a mobile phone-free environment by default, in accordance with the DfE's statutory guidance on Mobile phones in schools. Pupils do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime [unless a clearly defined exception has been agreed by the Head].

The Foundation recognises that notwithstanding the mobile phone ban, children may still have access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), through other personal devices such as smart watches or, where permitted, personal laptops or tablets. The Foundation's filtering and monitoring systems may not apply to content accessed via pupils' personal devices. Where those devices are not connected to the Foundation's network. To

mitigate this risk, the Foundation the Foundation's arrangements, which may include, for example: requiring any personal device used in School to connect to the internet only through the Foundation's filtered network; prohibiting the use of personal mobile data connections on the Foundation premises; restricting the types of personal devices that pupils may bring into school; and/or ensuring that any 'bring your own device' (BYOD) arrangements are subject to the Foundation's acceptable use policy and that devices are configured to comply with the Foundation's filtering requirements before being used on school premises. Any safeguarding concerns arising from a pupil's use of a personal device should be reported to the DSL immediately.

18. CYBER SECURITY

The Foundation recognises that cyber security is a safeguarding concern. If a child's sensitive data is compromised by a cyber-attack, it puts their safety and wellbeing at risk. The Foundation takes measures to safeguard children by protecting personal information and ensuring appropriate cyber security systems are in place, in line with the DfE's *Cyber security standards for schools and colleges* and the *Digital and technology standards in schools and colleges* (April 2026).

The Foundation's arrangements include maintaining an information asset register, keeping hardware and systems registers up to date, and having a disaster recovery and business continuity plan that addresses digital technology. The Foundation's is working towards meeting the six core digital and technology standards by 2030.

19. ONLINE SAFETY

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk as noted in Section 15 of this Policy i.e. content risk, contact risk, conduct risk and commerce risk.

Our Schools therefore:

- Are smartphone free by default (see Section 17 above)
- Liaise with parents to reinforce the importance of children being safe online and the systems the school uses to filter and monitor online use.
- Ensure that internet safety (including when children are online at home) is an integral part of the ICT curriculum and also embedded in REAL time and CORE and Relationships and Sex Education. See [Teaching online safety in schools](#) for further guidance.
- Have appropriate filters and monitoring systems in place (see Section 16 above)
- Ensure that school leadership teams and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. Staff should escalate concerns when identified using CPOMS.
- Ensure that all staff receive e-safety training and there are e-safety coordinators for each school. *Please see **Section 3: Roles & Responsibilities for the e-safety coordinator for each school.***
- Ensure that staff receive advice regarding personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules; *please refer to WCC guidance 'Policy on Staff/Governor Use of Social Networking and Internet Sites', the **Staff Code of Conduct and ICT Acceptable Uses Policy.*** (Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the local authority and may be subject to disciplinary action.)

*Further detail of our approach to online safety can be found in the Foundation's **ICT Acceptable Use Policy, Mobile Phone Policy and Behaviour and Relationship Policy** which also includes detail on the use of mobile technology in school (and accessing 3G, 4G*

and 5G technology on school premises) and IT arrangements (including filtering and monitoring). These systems will be reviewed at least annually, supported by an appropriate risk assessment.

The Foundation's **ICT Acceptable Use Policy** for staff and pupils also explains how we try to keep pupils safe in school and protect and educate pupils in the safe use of technology. Cyberbullying and sharing of nudes (including sexting) by pupils will be treated very seriously and will be managed through our **Anti-Bullying and Harassment Policy** and our safeguarding procedures where appropriate.

The Foundation recognises the additional risks that children with SEND face online and our Schools work with the Director of Digital Strategy to ensure that additional support and measures are in place to support these children.

20. RELATIONSHIPS EDUCATION AND/OR RELATIONSHIPS AND SEX EDUCATION ("RSE")

The Foundation 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 Foundation's Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment derogatory behaviour or other forms of physical violence and conflict. The Foundation focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The Foundation's curriculum also addresses online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help. The Foundation recognises that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

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

The Foundation's RE/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 Foundation will use. The Foundation proactively engages and consults parents in the development and review of this policy. Parents will be informed of their right to request that their child is withdrawn from sex education.

21. SPORT

The Foundation recognises that sport and physical activities can present unique safeguarding risks. Staff involved in the delivery of sport and physical education should be alert to safeguarding concerns that may arise in these settings, including risks associated with physical contact, changing facilities, one-to-one coaching, and away fixtures or tours. The Foundation will have regard to the relevant provisions in KCSIE and any guidance issued by relevant national governing bodies of sport or professional associations. Where the Foundation engages external sports coaches or providers, it will satisfy itself that appropriate

safeguarding checks have been carried out and that providers have adequate safeguarding policies in place.

22. LOOKED AFTER CHILDREN

The Trustees ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The designated member of staff who has responsibility for their welfare and progress can be found at the start of this policy. The Foundation ensures that the designated member of staff receives appropriate training in order to carry out their role.

23. OPERATION ENCOMPASS

The Foundation is part of Operation Encompass, which is an information sharing scheme placed on a statutory footing by Section 49A of the Domestic Abuse Act 2021 (as inserted by Section 20 of the Victims and Prisoners Act 2024). Operation Encompass supports children who experience domestic abuse.

Under this statutory duty, the police are required to notify the Foundation if they have reasonable grounds to believe that a child may be a victim of domestic abuse. This duty applies in respect of all children connected to a household where police attended a domestic abuse incident, including children who were not physically present at the time of the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and include the child's details, their relationship to the perpetrator and the voice of the child, such as what they are saying and how they are behaving.

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

[The DSL] and their deputy/ies have 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 Trustees about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children.

We ensure our parents are fully aware that we are an Operation Encompass setting including when a new child joins one of our Schools.

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

24. TEMPORARY ACCOMMODATION NOTIFICATION

Where the Foundation receives a notification from the local housing authority, under the Children's Wellbeing and Schools Act 2026, that a child has been placed in temporary accommodation, the DSL (or a DDSL) will:

- assess whether the child's welfare needs have changed and whether additional pastoral, academic or safeguarding support is required;
- liaise with relevant agencies, including the local housing authority and, where appropriate, local authority children's social care, to ensure coordinated support is provided; and
- make a referral to local authority children's social care where there are concerns that the child has been harmed or is at risk of harm.

This notification does not replace existing safeguarding and welfare duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the DSL in the usual way.

25. EQUALITY ACT 2010

The Foundation understands and recognises its obligations under the Equality Act and that the Foundation must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the Foundation will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The Foundation will also consider their duty to make reasonable adjustments for disabled pupils. The Foundation promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities.

The Foundation recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

All staff should also recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

The Foundation 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.

26. GENDER QUESTIONING CHILDREN

The Foundation is committed to safeguarding and promoting the welfare of all children and young people, including those who may be questioning their gender identity. Pupils experiencing gender-related distress or uncertainty will be treated with dignity, compassion and respect, and supported in a way that prioritises their welfare, wellbeing and educational needs.

The Foundation will not initiate any form of social transition. Where a pupil and/or their parent or carer requests support to facilitate a social transition, including changes to name, pronouns, appearance or other aspects of school life, the request will be considered on an individual basis. Decisions will be informed by safeguarding responsibilities, the best interests of the child, the impact on other pupils, parental views, relevant professional advice, and the Foundation's obligations under equality and human rights legislation.

The welfare of the child and the wider school community will be the primary consideration in all decision-making. The wishes of the pupil will be listened to carefully and respectfully; however, any agreed course of action may not necessarily reflect the outcome sought by the pupil where safeguarding or wider welfare considerations indicate otherwise.

Parents and carers will normally be informed and actively involved at the earliest opportunity. Their views will be given significant weight in determining what is in the best interests of their child. In the exceptional circumstance that involving parents or carers may place a child at risk of significant harm, the matter will be managed through established safeguarding procedures and led by the DSL.

The Foundation recognises that social transition is an active intervention with potentially significant implications for a child's development and wellbeing. Accordingly, our Schools adopt a careful and evidence-informed approach, particularly in relation to primary-aged children, and will ensure that decisions are appropriately documented and regularly reviewed.

All schools within the Foundation will maintain accurate records as required for safeguarding and legal purposes, including the accurate recording of a pupil's biological sex. Relevant information will be shared with staff on a need-to-know basis to enable them to fulfil their safeguarding responsibilities.

Regardless of any decisions made regarding social transition, the Foundation will not tolerate bullying, harassment, victimisation or discrimination. All pupils have the right to learn in a safe, respectful and inclusive environment. The Foundation will also support pupils whose views or circumstances change over time, including those who wish to reverse or amend previously agreed arrangements, working in partnership with parents, carers and relevant professionals to ensure the child's ongoing welfare and best interests remain central to decision-making.

27. BULLYING

While bullying between children is not a separate category of abuse, neglect and exploitation, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people. Bullying is discussed through assemblies and Princethorpe's REAL time programme and at Crackley Hall and Crescent School through the PSHE curriculum and assembly programme.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our **Anti-Bullying and Harassment Policy** found on the our Schools' website.

Where an issue of pupil behaviour or bullying gives reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, staff should follow the procedures below (see **Section 24**). In addition, subsequent to this, action may be taken under the school's **Anti-Bullying and Anti-Harassment** and **Behaviour Management Policies**.

28. BEHAVIOUR MANAGEMENT AND RESTRICTIVE INTERVENTIONS

The Foundation ensures that staff use proactive strategies and de-escalation wherever possible and restrictive interventions are used only when necessary, proportionate and time-limited to address an immediate risk of harm.

The Foundation does not operate a "no contact" policy. Staff may make appropriate, non-force physical contact in context (e.g., first aid, assisting with personal care in line with care plans, guiding a pupil, comforting a distressed pupil, or demonstrating activities), consistent with discharging safeguarding duties. The Foundation also recognises the risk that pupils with SEND may be disproportionately subject to the use of restrictive interventions.

Like all schools, we reserve the right for our staff to use reasonable force to control or restrain a pupil in specific circumstances. Staff may use restrictive interventions only when necessary to prevent a pupil from: causing injury to themselves or others; seriously damaging property where this creates a risk to safety; or posing an immediate risk of disorder that presents a risk of harm. Any intervention used will be the least restrictive option likely to be effective and used for the minimum time to reduce the immediate risk.

The Foundation's procedures for dealing with allegations of abuse against staff may be followed where an allegation of using excessive force is made against a teacher.

The Foundation's approach to use of restrictive interventions (and use of reasonable force) can be found in the ***Behaviour Management Policy***.

29. HEALTH AND SAFETY, CO-CURRICULAR ACTIVITIES, DAY AND RESIDENTIAL TRIPS

Our ***Health & Safety Management Policy*** and ***First Aid at Work Policy*** both reflect the consideration we give to the protection of our children both within the school environment and when away from the school when undertaking school trips and visits.

All co-curricular and off-site activities are subject to a risk assessment to satisfy Health and Safety and safeguarding requirements. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that suitable safeguarding arrangements are in place.

Where co-curricular activities are provided by and managed by the Foundation, this Safeguarding Policy and procedures will apply. If other organisations provide services or activities on the school sites during school time, our Schools will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

*Further details can be found in the **Educational Visits Policy**.*

30. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect pupils, we will:

- seek their parents' consent on admission to the Foundation for certain photographs to be taken or published (for example, on our website or in newspapers or publications), subject to the pupil's data rights to give their own consent;
- ensure pupils are appropriately dressed; and
- encourage pupils to tell us if they are worried about any photographs that are taken of them.

*The Foundation has a **Images of Pupils Policy** which can be found on each of our School's websites and also in the Staff Handbook on the VLE and also Crackley Hall and Crescent School Teacher Shared area on the intranet.*

31. ALTERNATIVE PROVISION

For the avoidance of doubt, where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. This includes obtaining written information from the alternative provider regarding safeguarding checks on individuals working at their establishment and written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk.

The commissioning school:

- should always know where a child is based during school hours and retain records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend
- should regularly review (at least half termly) the alternative provision placements they make.
- immediately review, and terminate, if necessary, a placement where safeguarding concerns arise unless or until those concerns have been satisfactorily addressed.

32. SITE SECURITY

Visitors to the Foundation, including contractors, are asked to sign in and given a visitor's badge which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe this Safeguarding Policy and health and safety regulations to ensure children in school are kept safe. The Head will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

33. TRAINING

Induction and training (including online safety) are in line with Warwickshire Safeguarding advice.

All Staff (including the Head)

All new staff will be provided with induction training (including online safety) that includes:

- the Foundation's **Safeguarding Policy** (including the policy and procedures to deal with child on child abuse);
- the identity and role of the DSL(s) and DDSL (and other key trained staff);
- the pupil **Behaviour Management Policy, Anti-Bullying and Harassment Policy** and **Images of Pupils Policy**
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or unexplained and/or persistent absences from education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- the **Staff Code of Conduct** (including the Foundation's whistleblowing procedure and the **Acceptable Use Policy**, low level concerns, online safety, staff/pupil relationships and communications including the use of social media)
- a copy of Part One of *KCSIE*
- School leaders and staff who work directly with children will also be required to read and sign for Annex A and Part Five of *KCSIE*.

Copies of the above documents are provided to all staff during induction. The **Staff Code of Conduct** can be found in the Staff Handbook. *NB all of the above will be explained before a new member of staff, trustee or volunteer has direct contact with children in school.* Newly qualified teachers receive more detailed training on safeguarding as part of their induction programme when they enter the Foundation.

Supply staff, temporary staff, trainees and contractors are given the **Staff Code of Conduct** on arrival and informed who the DSL (and DDSL) is and how to contact them and are given a safeguarding briefing by the DSL or DDSL.

Volunteers are provided with a safeguarding induction and a copy of the *KCSIE* and Staff Code of Conduct.

As part of the whole school safeguarding approach, all staff are also required to:

- Read and understand Part One of *KCSIE* and confirm that they have done so via a signed form. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be informed and updated on any changes by the DSL at staff meetings or during INSET.
- Understand key information contained in Part One of *KCSIE*. The Foundation will ensure staff understanding by completing an online child protection module through an appropriate training provider. Staff will also be given a copy of *KCSIE* and Staff Code of Conduct.

- Receive training in safeguarding and child protection regularly (including at INSET days), in line with advice from the WLCSE. Training will include:
 - online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
 - harmful sexual behaviours including sexual violence and sexual harassment between children
 - Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help
 - the safe and effective use of AI including training on identifying and mitigating the key risks associated with AI, including risks to safeguarding, data protection, ethics, and intellectual property. The Foundation will draw on the DfE's support materials on *Generative artificial intelligence in education*, developed in partnership with the Chiltern Learning Trust and the Chartered College of Teaching, including Module 3 on safe use
 - the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively, including online. The Schools provide these via, for example, via staff meetings.
- Receive training on the **Foundation's Images of Pupils Policy**.
- Complete online training on KSCIE annually.

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. All staff are made aware of the increased risk of abuse to certain groups, including disabled and SEN children, looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, extremism, female genital mutilation and forced marriage.

Those working in the early years provision will receive training every two years consistent with Annex C of the Early Years Statutory Framework, which may be refreshed annually as needed. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and inset training sessions, as well as termly meetings with their Head of Department which will always include safeguarding as an agenda item.

Trustees

All Trustees will 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 Schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated.

The Trustees are aware of their obligations under the Human Rights Act 1998 (in so far as it applies to our Schools), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the ECHR Convention.

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

DSL and DDSLs

The DSL (and DDSLs) receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to extremist ideology and radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the local safeguarding partners approach to *Prevent* duties and harmful sexual behaviours.

The DSL receives additional training on AI-related safeguarding risks, including the creation and sharing of AI-generated intimate imagery (deepfakes), the potential for AI tools to be used to groom or exploit children, and the application of the Foundation's filtering and monitoring arrangements to generative AI tools. Training will be reviewed and updated at least annually to reflect the rapidly evolving nature of AI technology.

The DSL also receives more in-depth training, including 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 the DSL to support other staff on Prevent matters and update them on relevant issues. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are regularly refreshed, and at least annually, to keep up with any developments relevant to their role. The refresher training is annually delivered by Warwickshire County Council's Education Safeguarding Service. That training will include up to date information about local safeguarding partners. The DSL will also be supported to access Warwickshire Safeguarding inter-agency training as part of their continuing professional development. The Foundation will also support the DSL 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.

All DDSLs are trained to the same level as the DSL.

34. STAFF REPORTING DIRECTLY TO CHILD PROTECTION AGENCIES

Staff should follow the reporting procedures in this Policy. Staff may refer directly with local authority children's social care and/or the Police if:

- in exceptional circumstances the DSL, the DDSL, the Head and/or the Chair of Trustees are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety; and/or
- for any other reason they make a judgement that a direct referral is in the best interests of the child.

However, staff should inform the DSL and/or Head at the earliest opportunity of the action taken. If in any doubt, members of staff may consult the MASH or seek support from the Education Safeguarding Manager.

See **Section 3**, *Key Contacts for contact details*.

35. SUPPORT FOR PUPILS, FAMILIES AND STAFF

All safeguarding concerns, allegations and incidents can be devastating for the child concerned and can also result in distress and anxiety for staff who become involved. We will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (usually the DSL) to be the central point of contact;
- where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our safeguarding, whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

36. SAFEGUARDING PROCEDURES¹

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

Our Schools have arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements can be found in the following:

- Behaviour Management Policy;
- Anti-Bullying and Anti-harassment Policy;
- Staff Code of Conduct.

Staff should expect to support social workers and other agencies following any referral.

Recognising abuse

Staff are referred to Appendix 2 of this Policy and Annex A of KCSIE which provides further information about specific forms of abuse and safeguarding issues.

To ensure that our pupils are protected from harm, we need to exercise professional curiosity and understand what types of behaviour constitute abuse, neglect and exploitation and their indicators. All Foundation staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

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 deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse (including teenage relationships abuse), criminal exploitation, county lines, extremist ideology and radicalisation and serious youth violence.

¹ In our procedures we may use the terms 'victim' alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. Although widely recognised and understood terms, the Foundation recognise the importance of care when using these terms in managing an incident; the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused by an adult or adults, by another child or children, 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 and other risks can take place wholly online, or technology may be used to facilitate offline abuse. Abuse may be physical (i.e. causing physical harm to a child), emotional (i.e. persistent emotional maltreatment of a child so as to cause severe and adverse effects on their emotional development) and/or sexual (i.e. 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). Child sexual and child criminal exploitation are also forms of child abuse.

Neglect is 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 include a parent/carer failing to: provide adequate food, clothing and shelter; protect a child from physical/emotional harm/danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

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

Impact of abuse

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

Taking action

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

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to help the child, for example, call 999;
- if you suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, act immediately and follow the procedures below;
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss with colleagues, friends or family;
- complete a record of concern, using a Form C (Green form); and
- seek support for yourself if you are distressed or need to debrief.

Referral to external agencies

Not all concerns about a pupil's welfare will meet the threshold for referral to external

agencies. Where the DSL determines that a concern can be managed internally, and doing so does not place the child at additional risk, the School will put in place appropriate pastoral support. This may include, for example, monitoring by the pupil's form tutor or head of year, referral to the School's counsellor or wellbeing team, or engagement with parents or carers. The DSL will keep such cases under review and will escalate to external agencies if the pupil's situation does not improve or if further concerns arise.

A) PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff (including trustees, supply staff, agency staff and volunteers) have any concerns about a child's welfare (which may include that they suspect or hear an allegation or complaint of abuse or neglect from a child or any third party), they must act immediately and follow the relevant procedure below.

Note, if it is a safeguarding concern relating to a member of staff, see the procedure at paragraph 27 below.

In the first instance, speak to the DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available to discuss safeguarding concerns, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.

Options will then include:

- managing any support for the child internally via the school's own pastoral support processes;
- undertaking an family help assessment; or
- making a referral for statutory services.

When hearing concerns/allegations, all staff should:

- listen carefully and allow them to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – 'I want to help', 'You are doing the right thing in talking to me';
- not be afraid of silences – staff must remember how hard this must be for the pupil;
- under no circumstances ask investigative and leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this; however, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen? 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 e.g. children may feel embarrassed or could be vulnerable due to their SEND or language barriers. Staff should exercise professional curiosity and speak to the DSL if they have concerns;
- reassure the individual that the allegation/complaint will be taken seriously, that they will be supported and kept safe. In order to help them, the member of staff must pass the information on. It is important not to guarantee absolute confidentiality as this may not be in the best interests to the child;
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by reporting any form of abuse and/or neglect;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;

- tell the pupil what will happen next and who the information will be passed to;
- let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day;
- report verbally to the DSL;
- write up their conversation as soon as possible on the record on Form C (Green form) and hand it to the DSL;
- determine how best to build trusted relationships with children and young people which facilitate communication; and
- seek support if they feel distressed or need to debrief.

The Schools operates its processes with the best interests of the pupil at their heart. Where there is a safeguarding concern, our Schools will ensure the pupil's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. Our Schools manage this by using restorative practices and procedures identified in the **Behaviour Management Policy**. The Schools' **Anti-Bullying and Anti-harassment Policy** is in place for children to safely express their views and give feedback, to confidentially report abuse (knowing that their concerns will be treated seriously) and there is provision in place to support dialogue with pupils with communications difficulties or vulnerabilities.

All concerns about a child's welfare and child protection referrals made under the procedures below, unless otherwise stated, should be made to local authority children's social care via the Multi-Agency Safeguarding Hub (MASH) by completing a Multi-Agency Referral Form (MARF) and submitting it to the MASH at mash@warwickshire.gcsx.gov.uk. The form can also be completed online.

Where a child is suffering, or is likely to suffer from harm, a referral should be made immediately and should be made in the first instance by telephoning the MASH (and the Police if appropriate). This should be followed by submission of a MARF (as above). Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team.

Contextual Safeguarding

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. Our Schools 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. Our Schools will share as much information with local authority 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.

B) WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT A CHILD

If staff (including governors/trustees, supply staff, agency staff and volunteers) 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 local authority children's social care (via MASH). As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. 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 (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure the child's situation improves. Staff should challenge any inaction and follow this up with the DSL and local authority 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 have safeguarding concerns about a child who is not a pupil at one of our Schools (for example, a sibling of a pupil, or a child attending an activity on the School's premises), they should follow the same procedures and report their concern to the DSL immediately.

C) WHAT STAFF SHOULD DO IF A CHILD IS IN DANGER OR AT RISK OF HARM

If staff (including governors/trustees, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm they should make an **immediate** referral to local authority children's social care (via MASH) and/or the Police in accordance with WSCE referral process. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the Police and local authority children's social care.

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and local authority children's social care as appropriate.

D) WHAT SHOULD STAFF DO IF A CHILD IS SEEN AS AT RISK OF RADICALISATION

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

The Schools, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL and Trustees responsible for safeguarding to ensure the schools safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism (including online) and are regularly revised as needed.

E) WHAT STAFF SHOULD DO IF THEY DISCOVER AN ACT OF FEMALE GENITAL MUTILATION ("FGM")

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve local authority children's social care as appropriate. Staff are referred to Appendix 2 of this Policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

F) WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS THAT CHILDREN ARE AT RISK FROM OR INVOLVED WITH SERIOUS VIOLENT CRIME

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include periods of prolonged and/or regular absences from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in 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 local authority children's social care (via MASH).

G) HOW SHOULD STAFF RESPOND TO AN INCIDENT OF NUDES AND SEMI-NUDES BEING SHARED BY PUPILS (INCLUDING THOSE GENERATED USING AI)

The Foundation is alert to the safeguarding risks arising from AI in this context, including the generation of deepfake intimate images using AI tools and the use of AI to create child sexual abuse material. Taking and sharing AI-generated intimate images of those aged under 18 is a criminal offence. Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

The Foundation recognises that images of pupils published on its website, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The Foundation's approach to obtaining consent for, publishing, and managing pupil images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the Foundation's Acceptable Use of Images Policy. Staff should refer to that policy for guidance on the publication of pupil images and should report any concerns about the misuse or manipulation of published images to the DSL immediately.

All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes (including those that are AI generated) 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 creation, sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

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 often 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 nude or semi-nude images and/or videos 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.

All incidents of sharing of nudes, whether consensual or non-consensual, should be treated as a safeguarding concern and require a safeguarding response. That response should be proportionate to the relevant circumstances of the incident, including age and any element of coercion or vulnerability.

All incidents involving the sharing of nude or semi-nude images will receive a safeguarding response, regardless of whether they are consensual or non-consensual. The Schools will take a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

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 pupil or of a pupil, **they should report the incident to the DSL or equivalent immediately.**

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download; **this is illegal**
- **Do not** delete the imagery or ask the young person to delete it

Any device in the possession of a pupil (e.g. mobile phone, tablet, digital camera) which is related to an incident of sharing of nudes should be passed to the DSL who will decide if the device needs to be passed to the Police. Any decision to confiscate a device will be made in accordance with DfE advice *Searching, Screening and Confiscation – Advice for headteachers, school staff and governing bodies (July 2022)*.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" and "*Sharing nudes and semi-nudes: how to respond to an incident (overview)*" (both updated 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 pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as local authority 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 nude or semi-nude images and/or videos including those generated using AI, 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.

The DSL's decision as to whether to report a 'sharing of nudes' incident will also give due regard to whether the incident was aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images 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 sharing of nudes will usually be referred to MASH for advice about whether or not a response by the Police and/or local authority children's social care is required. This will facilitate consideration of whether:

- there are any offences that warrant a Police investigation;
- 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 an early help services.

Examples of aggravated incidents include:

- any evidence of pressurising, intimidating, bullying, extortion and/or threatening of pupils by one or more other pupils to create and share indecent images of themselves;
- pressure applied to a number of pupils (e.g. all female pupils in a class or year group) to create and share indecent images of themselves;
- pressurising a younger pupil or pupils to create and share indecent images of themselves;
- pressurising a pupil 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 also consider the situation in which indecent images may have been shared i.e. with a small number in a known friendship group with no previous concerns constitutes an aggravated incident.

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.

Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

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

H) WHAT STAFF SHOULD DO IF A CHILD IS ABSENT FROM EDUCATION

A child who is absent from education, particularly on repeat occasions and/or prolonged periods (including persistently for parts of the school day) or where the absences are unexplainable, and children missing education, can be a vital warning sign of a range of safeguarding possibilities, such as abuse, neglect and sexual and criminal exploitation – particularly county lines. Where reasonably possible our Schools (except those in the early years setting) hold more than one emergency contact number for each pupil so additional options are available to make contact with a responsible adult when a child is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safety concern. In our early years setting, where possible the setting should hold more than two emergency contacts numbers for each child.

Our Schools response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. Staff must follow the Foundation's procedures for dealing with children who are absent from education (i.e. repeatedly and/or for prolonged periods) and children missing education (see the Foundation's **Missing Child Policy and Attendance Policy**).

School attendance registers are carefully monitored to identify any trends. The DSL will monitor unauthorised absence and take appropriate action, particularly when children go missing on repeated occasions and/or are missing for periods during the school day. All unexplained or unauthorised absences will be followed up in accordance with our **Attendance Policy** and **Missing Child Policy**. Action should be taken in accordance with this Safeguarding Policy if any absence of a pupil from the school gives rise to a concern about their welfare.

Our Schools will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more. The Foundation follows the DfE legal requirements for schools in respect of recording and reporting of children who leave school without any known destination.

When working with local authority children's services where school absence indicates safeguarding concerns our Schools will have regard to the statutory DfE guidance '*Working together to improve school attendance*' and to the EYFS Statutory Framework for children aged 0-5 years.

Our Schools will inform the local authority of any pupil of compulsory school age who is going to be added to or deleted from the admission register at non-standard transition points on one of the grounds set out in The School Attendance (Pupil Registration) (England) Regulations 2024. Our Schools will notify the Children Missing Education ('CME') Officer in the local authority as soon as the grounds for deletion are met and no later than the time at which the pupil's name is removed from the register.

It is essential for our Schools to comply with these duties as it will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are 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, neglect, exploitation or radicalisation.

Please see **Section 3: Key Contacts** for contact details of the Children Missing Education Service.

Deletions from roll agreed with the CME Officer and/or triggering one of the permitted grounds for deletion under The School Attendance (Pupil Registration) (England) Regulations 2024 will normally be backdated to the first day of the absence, unless an alternative deletion date is required under the Regulations. If the CME Officer is able to contact the pupil and her/his parents, arrangements will be made with the school and family for a return to education, including a re-integration programme where necessary. If the pupil has registered at another school, the school will delete the child's name from our roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

Children who run away or go missing from home or care - Return Home Interviews

All our Schools will work closely with their local authorities to support pupils who run away or go missing, including facilitating Return Home Interviews (both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on school site for the interview to take place). Our Schools will check with the local authority whether or not parents/carers have given their consent to such interviews. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore to participate in a RHI or not. If the local authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent, our Schools will contact the parent/carer and seek to secure their consent. Parents/carers may also choose to accompany their son/daughter in interviews, and the school/college will facilitate that as appropriate.

DfE 'Statutory guidance on children who run away or go missing from home or care' (January 2014) provides further information on the steps local authorities and their partners should take to prevent children from doing missing and to protect them when they do. This guidance complements the WT guidance and 'Children missing education: statutory guidance for local authorities' (September 2025).

I) WHAT STAFF SHOULD DO IF A CHILD NEEDS 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 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 that 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 missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

J) WHAT STAFF SHOULD DO IF A CHILD REQUIRES MENTAL HEALTH SUPPORT

Our Schools have an important role to play in supporting the mental health and wellbeing of our pupils. Specifically, staff can support the fulfilment of 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,

- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

All staff should be aware that mental health problems can, in some cases develop into a safeguarding concern. This could include, for example, self-harm, eating disorders, or suicidal ideation. 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. Our Schools aim to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils.

Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

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

Where support is needed, the DSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

The DSL will call 999 if there is immediate danger and NHS 11 for urgent non-emergency mental health support.

Staff should not wait for a formal diagnosis before raising a concern with the DSL. If staff feel that a child is in immediate danger and the DSL or DDSL is not available, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

K) WHAT STAFF SHOULD DO IF THEY HAVE A SAFEGUARDING CONCERN OR AN ALLEGATION ABOUT ANOTHER STAFF MEMBER (INCLUDING SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS)

If staff have a safeguarding allegation or concern (no matter how small) about another staff member (including supply staff, agency staff, contractors and volunteers) - including what may seem minor contraventions of the **Staff Code of Conduct** – then this should be referred to the Head. This may include concerns within and outside the workplace (including online). Where there are concerns / allegations about the Head, this should be referred to the Chair of Trustees. Where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the LADO(s). In the event of concerns/allegations being made, the procedures set out in the Staff Code of Conduct will be followed. Staff may also report concerns about suspected abuse or neglect directly to MASH, Multi Agency Support Hub or the Police if they believe direct reporting is necessary to secure action and immediate action needs to be taken.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the low-level concern procedures below.

L) WHAT STAFF SHOULD DO IF THEY HAVE SAFEGUARDING CONCERNS ABOUT SAFEGUARDING PRACTICES

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the Foundation's whistleblowing procedures which can be found in the **Staff Handbook** of the VLE and also on Teacher Shared area on the intranet at Crackley Hall and Crescent School. It enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place. 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, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#) and the [NSPCC's what you can do to report abuse dedicated helpline](#).

*For contact details please see **Section 3, Key Contacts**. Contact numbers for local authority Children's Social Care, the Police and the LADO and the NSPCC whistleblowing helpline are also displayed in the staff room.*

37. CHILD ON CHILD ABUSE AND HARMFUL SEXUAL BEHAVIOUR

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying behaviour and will use the school's **Anti-Bullying and Anti-Harassment and Behaviour Management Policies** and procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under these procedures: where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the **Anti-Bullying and Anti-Harassment and Behaviour Management Policies** in the first instance (although, subsequent action may be taken in accordance with these Policies, if necessary).

Child on child abuse (including child on child sexual violence and harassment) is abuse by one or more children against another child. It is a safeguarding concern for both the victim and the alleged perpetrator and is preventable. It can happen both inside and outside of school, and online. It can manifest itself in many ways, including upskirting, consensual and non-consensual making or sharing of nude or semi-nude images and videos, harmful sexual behaviours, sexual violence and sexual harassment, which may include misogyny/misandry and causing someone to engage in sexual activity without consent. Child-on-child abuse is most likely to also include, but may not be limited to discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents.

Child-on-child abuse is never acceptable: the Foundation has a zero-tolerance approach to abuse. Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive behaviour should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys", as this can lead to a culture of unacceptable behaviours (with children not coming forward to report it) and an unsafe environment. 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.

Child-on-child abuse can be associated with factors outside the school and can occur online and face to face and between two or more children of any age or gender. Our Schools therefore take a contextual safeguarding approach to managing child-on-child abuse.

Our Schools have procedures in place to minimise the risk of child-on-child abuse, including giving robust advice to pupils, providing adequate supervision and broadly in the provision of pastoral care appropriate to the needs of the pupils. Our Schools will also ensure that children are aware of how they can report abuse, and that they are aware of the procedures that will be followed 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 arrangements and procedures below 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. Even if there are no reports in school it does not mean child-on-child abuse is not happening; it may be the case that it is just not being reported. If staff have any concerns regarding child-on-child abuse they must speak to the DSL (or DDSL).

WHAT TO DO IF STAFF SUSPECT THAT A CHILD MAY BE AT RISK OR HEARS A REPORT OF CHILD-ON- CHILD ABUSE

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

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

Even if there are no reports in school, it also does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, or where child-on-child abuse is disclosed to them, they should follow the safeguarding procedures using the Green Form and speak to the DSL (or DDSL) without delay.

All staff are trained to manage a report. Effective safeguarding practice (including for responding to child-on-child violence and sexual harassment) includes:

- if possible, managing reports with two members of staff present (preferably one of them being the DSL or a DDSL). However, this might not always be possible;
- not promising confidentiality as it is very likely a concern will have to be shared further (for example, with the DSL or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that a first disclosure may only be the first incident reported; it is not necessarily representative of a singular incident. It is therefore important to take all reports of abuse seriously regardless of how long it has taken for the child to come forward;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about how the report will be progressed, not asking leading questions (although staff can ask children if they have been harmed and what the nature of that harm was);
- keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;
- waiting until the end of the report and immediately write up a thorough summary. It may be appropriate to make notes during the report, however, if making notes, staff should be conscious of the need to remain engaged with the child;
- only recording the facts as the child presents them;

- where the report includes an online element, including images or videos generated using AI, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on *Sharing nudes and semi-nudes: advice for education settings working with children and young people*³²;
- informing the DSL (or DDSL), as soon as practically possible, if the DSL (or DDSL) is not involved in the initial report.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be considered in the wider context in which it may have occurred. All children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

As part of this, our Schools will take into account the views of the child/children affected. 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 DDSL who should consider parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the Pastoral and Safeguarding team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. We recognise that children with special educational needs and disabilities or certain health conditions can be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will provide extra pastoral support for those children; this additional support will be delivered by a member of the learning support team. We also recognise that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

A pupil against whom an allegation of abuse has been made may be suspended from the school during an investigation. The relevant 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 pupils involved including the alleged "victim" and "perpetrator". If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the WSCE, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the WSCE and/or Police as appropriate.

REPORTS CONCERNING HARMFUL SEXUAL BEHAVIOUR

The approach detailed immediately above for responding to reports should be followed. Where a report concerns an allegation of sexual violence and/or sexual harassment, if possible two members of staff should be present when managing the report (preferably one of them being the DSL or DDSL).

² Consensual image sharing, especially between older children of the same age, may require a different response. Whilst not abusive, children still need to know it is illegal, whilst non-consensual sharing is illegal and abusive.

Consideration of safeguarding all those children involved will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. This will include considering:

- the wishes of the victim in terms of how they want to proceed,
- the nature of the alleged incident, including whether a crime may have been committed and/or whether HSB has been displayed,
- 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 (noting that sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature),
- that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- any ongoing risks to the victim, other children, adult students, or school/college staff;
- Importance of understanding intra-familial harms and any necessary support for siblings following incidents;
- other related issues and wider context (such as that such abuse can take place within intimate personal relationships between peers, or any links to CSE/CEE).

When there has been a report of sexual violence, the DSL or DDSL should make an immediate risk and needs assessment in respect of each child affected by the abuse. 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” (especially their protection and support);
- whether there have been any other victims;
- the alleged “perpetrator”;
- all other children (and, if appropriate, staff) at the school, especially if actions that are appropriate to protect them from the alleged perpetrator(s), or future harms; and
- the time and location of the incident, and any action required to make the location safer.

The DSL will consider as part of the school’s response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. Any response and action will, as always, have at the centre the best interests of the child. The DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

The DSL will consider the risks posed to all pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include 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 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 DSL will also consider intra-familial harms and whether any support for siblings is necessary following an incident, and the part social media may play in such incidents (e.g. those involved could harass or bully or be subjected to harassment or bullying). Any professional risk assessment will inform the school’s approach.

The management of children and young people with sexually harmful behaviour is complex and the Foundation will work with other relevant agencies to maintain the safety of the whole community. The 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, breasts and genitalia. Rape, assault by penetration and sexual assaults will usually be passed to the Police. A report to the Police will generally be made in parallel with a referral to local authority children's social care. Where a report has been made to the Police, the school should 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. The school should also discuss the best way to protect the victim and their anonymity. If the DSL decides to make a referral to local authority children's social care, MASH Multi Agency Hub and/or a report to the Police against a "victim's" wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help.

In circumstances where a child displays sexualised inappropriate behaviour but evidence of sexual harm towards other children is not clear cut, the DSL may seek consultation and advice from Sexualised Inappropriate Behaviours Service and/or the Education Safeguarding Manager. In deciding the most appropriate response, relevant considerations will include:

- the nature and extent of the inappropriate/abusive behaviours. In respect of sexual abuse, it is necessary to distinguish between normal childhood sexual development and experimentation; and sexually inappropriate or aggressive behaviour;
- the context of the abusive behaviours;
- the child/young person's development, family and social circumstances;
- the need for services, specifically focusing on the child/young person's harmful behaviour as well as other significant needs; and/or
- the risks to self and others, including other children in the school, household, extended family, peer group and wider social network.

The DSL or DDSL will also work closely with local authority children's social care and other agencies as required to ensure any action taken under this Policy (including any disciplinary measures) does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the Police and local authority children's social care to ensure the welfare and safety of all children (including the suspected person) and update the risk assessment and ensure relevant protections and measures are in place for all children to manage any assessed risk of harm that may arise within the school.

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 local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the school's **Behaviour Management Policy**. The school will also consider whether disciplinary action may be appropriate for any other child/children involved. Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it. Any disciplinary action and providing appropriate support are not mutually exclusive; they can occur at the same time.

The Foundation is committed to participating in plans both to provide pupils who are at risk from other children and those pupils who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitating on-going access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school will also be informed by the Police or MASH, Multi Agency Support Hub about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in relation to alleged sexualised inappropriate or sexually abusive behaviour displayed by pupils inside and/or outside school. In all such circumstances, the school may be required to attend a strategy meeting under multi-agency child protection procedures in order to facilitate risk management and planning with other agencies.

In responding to cases involving children or young people who have committed sexually abusive behaviours, local authority children's social care will consult with the Sexualised Inappropriate Behaviours Service (SIBS), for advice, consultation or provision of a direct service. A wide range of practice guidance, knowledge and therapeutic materials has been developed by SIBS to inform the interventions relating to children and young people with sexual behaviour difficulties. Such support may include early help.

Records of concerns, discussions and decisions made

The school will keep a written record of all concerns, discussions and decisions made, and 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. Consideration should be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

38. ALLEGATIONS OF ABUSE PROCEDURES

A) ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, DSL, SUPPLY STAFF, TRAINEE TEACHERS AND VOLUNTEERS)

The Foundation's procedures for managing concerns/ allegations against staff (including supply staff, contractors and volunteers) who are currently working in our Schools whether in a paid or unpaid capacity follows Department for Education statutory guidance and local safeguarding partners arrangements and applies when Foundation staff (including supply staff and volunteers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil;
- behaved towards a pupil 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 indicated they may not be suitable to work with children, including behaviour that may have happened outside of school.

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

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also 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.

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.

1. All concerns and allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Trustees. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair and designated officer who is Warwickshire's Education Safeguarding Children's Manager (via Warwickshire MASH or the Multi-Agency Safeguarding Hub). The school will not take action before consulting the designated officer. If the Chair of Trustees is absent the Deputy Chair of Trustees will assume role of Chair. However, staff may consider discussing any concerns with the DSL and may make any referral via them.
2. The case manager should immediately (within 24 hours) discuss the allegation with the designated officer 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 may 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 designated officer 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 local authority children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer to make a referral to local authority children's social care.
4. Before contacting the designated officer, the school should conduct basic enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, , such as:
 - Was the individual in the school at the time of the allegation?
 - Could they have come into contact with the child?

The Schools should establish what initial information the designated officer will require, and if in doubt check with the designated officer before undertaking any initial enquiries, to ensure not to prejudice the position. The Schools should **not** undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

5. 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 designated officer, and if appropriate, the Police and/or local authority children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by local authority children's social care or the Police. 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.

6. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension 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 designated officer, their HR advisor and *WT* and *KCSIE* (including the alternatives), as well as the Police and local authority children's social care (if relevant) when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the school and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

7. The Foundation has a duty of care to its staff, so whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved.
8. Where further enquiries are required to enable a decision about how to proceed, the designated officer 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. This may be by a senior member of staff, unless there is a lack of resource or due to the nature or complexity of the allegation it requires an independent investigator to be appointed to undertake the investigation.
9. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from local authority children's social care 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.
10. The case manager will monitor progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair way. 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.

11. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
12. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services
 - a. The school has a legal requirement to promptly make a referral to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the person 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 removed an individual had they not left).
 - b. 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 and TRA where appropriate.
 - c. Further or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
13. Where initial discussions lead to no further action, the case manager and the designated officer should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.
14. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer 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. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases 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.
15. Any incidents will be followed by a review of the Safeguarding procedures within the Foundation, with a report being presented to the Trustees without delay.

B) ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTORS

The procedures for managing allegations against staff above also apply to staff not directly employed by the Foundation, for example, supply teachers provided by an employment agency or business ('the agency').

The Foundation will usually take the lead, to ensure appropriate action is taken. The Foundation will be responsible for gathering the facts and managing the safeguarding process, but agencies should be fully involved and will usually lead on any disciplinary action. The Foundation will co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the Foundation decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the designated officer to determine a suitable outcome. The Foundation will discuss with the agency 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 Foundation will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the designated officer, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the Foundation during the investigation.

When using an agency, the Foundation should inform the agency of its process for managing allegations 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 first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

C) ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT TRUSTEES

If an allegation is made against a trustee, the Foundation will follow its local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

D) ARRANGEMENTS FOR DEALING WITH CONCERNS OR ALLEGATIONS THAT DO NOT MEET THE HARD THRESHOLD/ LOW-LEVEL CONCERNS

Our Schools recognise that addressing low-level concerns is important to create and embed a culture of openness, trust, and transparency in which our School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff. As such, as part of the whole school approach to safeguarding, the Foundation will ensure the promotion of an open and transparent culture in which **all** concerns (no matter how small) or allegations that do not meet the harms threshold about all adults working in or on behalf of the Schools (including supply teachers, volunteers, Trustees and contractors) are dealt with promptly and appropriately.

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

- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer

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'. Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language;
- humiliating pupils.

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). Such concerns may arise in several ways and from a number of sources e.g. from a child, parent, member of staff or as a result of vetting checks undertaken.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Reporting concerns:

Staff must share all concerns with the DSL (or a DDSL) without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner by the Head. Where a low-level concern is raised about the DSL, it should be shared with the Head. If the low-level concern relates to the Head or the Head's partner or child, it should be shared with the Chair of Trustees.

The DSL/Head should:

- speak to the person who raised the concern (unless it has been raised anonymously);
- review the information and determine whether the behaviour is entirely consistent with the Staff Code of Conduct and the law, constitutes a low-level concern, is serious enough to consider a referral to the LADO, or when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- **where the DSL/Head is in any doubt whatsoever, they should seek advice from the LADO;**
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis. The Head is the ultimate decision-maker in respect of all low-level concerns, except where the concern relates to the Head (in which case the Chair is the ultimate decision-maker).

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.

When a low-level concern has been raised by a third party, the DSL should collect as much evidence as possible by speaking where possible with the person who raised the concern, to

the individual involved and to 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 by the DSL. 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. The information will be retained in accordance with the **Foundation's Records Retention Policy**.

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 relevant 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 Foundation'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 then follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL (or DDSL), and/or the Head. The concern will be recorded, and 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 Head will consult with the LADO and take a more collaborative decision-making approach.

See **Section 3, Key Contacts** for contact details for the Education Safeguarding Children's Manager, the Chair of Trustees & Deputy Chair of Trustees

E) ALLEGATION OUTCOMES

Only substantiated allegations/concerns should be included in references, provided that the information is factual and does not include opinions. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance or where the low-level concern meets the harms threshold for a referral to the LADO and found to be substantiated.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's confidential personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. 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. All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references.

Where an allegation by a child is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the Behaviour Policy

of the school; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

Where an allegation is determined to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to have been deliberately invented or malicious,

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether it is appropriate to require that parent to withdraw their child or children from the Foundation on the basis that they have treated the Foundation or a member of staff unreasonably.

In accordance with *KCSIE*, our Schools will make every reasonable effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

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

F) ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The Foundation may receive an allegation or concern relating to an incident that happened when an individual or organisation was using our Schools 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, our Schools will follow this Safeguarding Policy and procedures, including informing the LADO.

When services or activities at our Schools 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 our Schools, our Schools 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 Foundation will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (February 2026) and will seek assurance in this regard.

Our Schools have arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

39. CONFIDENTIALITY AND INFORMATION SHARING

All Foundation staff will understand that child protection issues warrant a high level of confidentiality. Staff will ensure confidentiality protocols are adhered to, and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL or DDSL or outside agency as required (e.g. Education Safeguarding Manager). If any member of staff receives a request to see child protection records, they will refer the request to the Head or DSL and Foundation Head of Business Services.

Whilst it is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children's general needs are met in school, staff should share all

safeguarding concerns with the appropriate member of staff as identified in this Policy. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

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

Safeguarding information will often be special category personal data, and the Foundation will have due regard to its data protection obligations when sharing such data. The Foundation 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, it would be legitimate to share information 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 pupils' personal data where the serious harm test is met.

Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 nor the UK GDPR prevent the sharing of information for the purposes of keeping children safe. When deciding what information to share, staff should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. Care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. If in doubt about what information can and should be shared, staff should speak to the DSL

Warwickshire Safeguarding's guidance 'Information Sharing in Child Protection' is Appendix 9 of the Warwickshire Safeguarding inter-agency child protection procedures and can be accessed at www.warwickshire.gov.uk/wscbresources. In addition all staff and Trustees are recommended to have regard to the DfE's [Data Protection Guidance for schools](#).

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected and encrypted and kept in locked storage. Further details can be found in the Foundation's ICT Acceptable Use Policy and Data Protection Policy.

The Foundation has appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-

year moves, in line with the statutory guidance. When sharing safeguarding information the Foundation will clearly distinguish current safeguarding concerns and support needs from historic information.

Where a school in the Foundation receives safeguarding information for pupils this will be reviewed by the school DSL who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns this may include a conversation between the DSLs at both settings. The DSL will ensure that key staff are aware of any relevant information for new pupils.

Where a school in the Foundation receives any information that indicates an incoming pupil may present a risk to others and/or themselves, the school will assess the risk and put in place a safety and support plan for when the child arrives.

40. RECORD KEEPING

The Foundation will maintain safeguarding records in accordance with *KCSIE* and guidance provided by WCC Education Safeguarding Service *Child Protection Record Keeping Guidance*.

In accordance with this guidance, the Foundation will:

- ensure all concerns, discussions and decisions (together with reasons) made under these procedures are recorded in writing (and includes instances where referrals were / were not made to another agency). This will also help if/when responding to any complaints about the way a case has been handled by the school. Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information. Records will include a clear and comprehensive summary of the concern; date; details of how the concern was followed up and resolved; and a note of any action taken, and the decision reached and outcome. This includes any decision to share or withhold safeguarding information together with the reasons for it and who the information has been given to;
- keep information confidential and stored securely;
- record all risk and needs assessments following a report of sexual violence and all risk assessments following a report of sexual harassment;
- ensure all discussions between the designated officer and case manager following an allegation of abuse against a member of staff (including supply and agency staff, contractors and volunteers) and a Trustee is recorded in writing;
- keep records in a folder in a meticulous chronological order;
- review records relating to low-level concerns so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified, and appropriate action taken;
- ensure all records are kept secure and in locked locations.

Child protection records will be maintained independently from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. Such records will only be accessible to the DSL and DDSs and those members of senior management team on a "need to know" basis and shall be shared in accordance with *KCSIE*.

All Foundation staff will record any safeguarding or child protection observations or concerns about a child using CPOMS. Staff without access to CPOMS should use *Logging A Concern About A Child's Safety And Welfare* (Form C) also known as the 'Green form'. Copies of this form are found in the staff room, the DSL's office at Princethorpe, Crackley Hall and Crescent. Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record. Records of safeguarding/child protection observations or concerns can be completed electronically or as

a paper version, but it is most important that all staff use one consistent system for the recording of concerns and that all records are passed to the DSL, who should complete the form to confirm what action has been taken.

41. ARRANGEMENTS FOR USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

When services or activities at our Schools 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 our Schools, our Schools will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and our Schools 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. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Our Schools will ensure that the DSL or DDSL can be contacted and/or is available at all times when 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.

Our Schools will ensure that safeguarding requirements are included in any agreement for use of the school premises 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 our Schools will have regard to the DfE's non statutory guidance '*After school clubs, community activities, and tuition (safeguarding guidance for providers)*' (February 2026).

42. EARLY YEARS FOUNDATION STAGE ARRANGEMENTS

This Policy applies equally to children in EYFS either during the normal school day or attending after school club or holiday club.

The School adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding safer sleeping arrangements, paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

Disqualification from working in childcare

Where staff work in, or are involved in the management of, any of our early years or provision of care of children under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of our safer recruitment practices, further details of which can be found in the Foundation's **Safer Recruitment Policy**.

The Foundation will record all checks of staff employed to work in or manage relevant childcare on a Single Central Record. Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Staff who are disqualified may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children.

Use of mobile phones and cameras

The Foundation's policy on the use of mobile phones and cameras in the setting can be found in the Foundation's **Images of Pupils Policy** and as detailed here. Members of staff, children and parents should not use their private cameras or mobile devices to record images of children at any time within our EYFS setting (nursery and reception years) or whilst on school trips. Parents will wish to use their mobile phones or camera in or around the EYFS setting must first obtain the prior approval of the Head.

Staff who wish to use take photographs or video of pupils (whether on a personal or school device) must first speak with the Head to obtain their approval before taking any image of a pupil. Photographs will only be taken of children with their parents' consent using school equipment. Photographs will be downloaded onto school computers only and will be monitored and stored in accordance with the school's data protection policies and procedures.

Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action.

Screen use

The Foundation has regard to Government guidance on screen use for children in the early years, including the impact of screen time on children's health, development and wellbeing. The Foundation's approach to screen use in the EYFS setting is age-appropriate and is set out in the Acceptable Use Policy. Staff in the EYFS setting are aware of the risks associated with excessive or inappropriate screen use for young children and take steps to manage and limit children's exposure to screens in line with the guidance.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early year's settings can be found on the *key contacts page 'Roles and Responsibilities' Part 3*.

Safeguarding training for EYFS

The Foundation ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework (July 2026) .

The Foundation's safeguarding training will be renewed every two years and the Foundation will consider whether staff need to undertake annual refresher training during any two-year period and to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at the school.

43. CONCERNS AND COMPLAINTS

Parents are encouraged to raise any concerns directly with the relevant school, if necessary, using this Safeguarding Policy for concerns about the safety and/or welfare of children. Our **Parents' Complaints Procedure** will otherwise be followed where a parent raises concerns. The Parents' Complaint procedure is available on request from our Schools.

Complaints from staff are dealt with under the Foundation **Grievance Policy**.

Complaints which escalate into a safeguarding concern will be managed under this Policy.

44. MONITORING, EVALUATION AND REVIEW OF POLICY & PROCEDURES

We are aware that the Safeguarding Policy will adhere to on-going legal changes and obligations. Therefore, it is the responsibility of the Head, DSL and Senior Management Team to ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay. The Trustees will undertake an annual review of the Foundation's Safeguarding policies and procedures and of the efficiency with which the related duties have been discharged and the effectiveness of procedures and their implementation, including lessons learned. The Trustees also ensure that the Foundation's safeguarding policies and procedures are transparent, clear, and easy to understand for staff, pupils, parents, and carers.

The Foundation draws on the expertise of staff, including the DSL(s), in shaping the Schools' safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the local authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future

The DSLs for Princethorpe College, Crackley Hall and Crescent School will produce an annual report on Safeguarding for the Trustees and will meet with the Nominated Safeguarding Trustee who has oversight for their respective school, termly, to feedback, monitor and evaluate all child protection issues including training to staff.

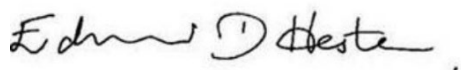
This Policy was adopted by the Governing Body on [21 September 2026].

The Policy will be reviewed in 2027 (or sooner if required)

Signed by the Chair of Trustees



Countersigned by the Foundation Principal



Countersigned by the Head of Princethorpe College



Countersigned by the Head of Crackley Hall



Countersigned by the Head of Crescent School



45. Appendix I – Logging a safeguarding concern form

The following pages show a blank example of Warwickshire County Council's 'Form C' which staff at all Foundation schools will now use to log all child protection concerns.

Logging a concern about a child's safety and welfare

*** Guidance notes for completion ***

PART 1:

Pupil's Name:	Date of Birth:
Date:	Time (of writing this record):
Name: Print Signature Job Title:	
Note the reason(s) for recording the incident. <i>Summary in a few words of the concern, e.g. concern about child's physical presentation including smells/something child said to an adult or another child/child's behaviour/child's comments in a lesson/interaction between child and parent</i> <i>e.g. indirect disclosure raising concern about possible physical abuse/sexual abuse/emotional abuse/neglect</i> <i>e.g. direct disclosure of physical abuse/sexual abuse/emotional abuse/neglect</i>	
Record the following factually: Who? What (If recording a verbal disclosure by a child use their words)? Where? When (date & time of incident)? Any witnesses? <i>Which child is the concern about?</i> <i>Were any other children or staff present?</i> <i>What exactly was seen, heard, smelt or said that has raised concern?</i> <i>Record direct disclosures/statements/comments using child or adult's exact words within quotation marks</i> <i>Where and when was whatever is being recorded seen or heard?</i> <i>As far as it is possible to identify, if a child or adult is reporting an incident that occurred previously, who was involved and where and when did it take place?</i>	
Professional opinion where relevant (how and why might this have happened?) <i>Facts for which there is demonstrable evidence should be recorded as such, e.g. the child was crying, the child said ".....", the child has a bruise on the left cheek of her/his face.</i> <i>It is important and reasonable to record professional opinions, impressions and worries that fall short of facts but these must be recorded as such, e.g. "I formed the impression that the child was frightened because....."; "In my opinion", the child was not provided with adequate care before coming to school because....."; "I was concerned that mother had been drinking alcohol and should not be driving the children home because I could smell alcohol and her speech was slurred".</i>	
Note actions, including names of anyone to whom your information was passed. <i>Clear statement of what the member of staff recording the concern did in response, e.g. reassure child, tell parent they would have to record and report what parents had told them, inform DSL.</i>	
Any other relevant information (Factual) <i>Any additional information the member of staff considers relevant and necessary for DSL to know in order to safeguard child and decide most appropriate response</i>	

Check to make sure your report is clear now – and will also be clear to someone else reading it next year

PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD



(Designated Safeguarding Lead to complete Part 2 overleaf)

PART 2: (for use by Designated Safeguarding Lead)

*Working for
Warwickshire*

Time & date information received by DP, and from whom	<i>Time and date green form received by DSL from person recording the concern</i>
Any advice sought by DP (date, time, name, role, organisation & advice given)	<i>Details of whoever DSL speaks to after receipt of green form, e.g. parents/carer; social worker in Children's Social Care; Education Safeguarding Manager; Police Officer</i>
<p>Action taken (referral to children's services/ monitoring advice given to appropriate staff/ CAF etc) If decision not to refer, justify reason.</p> <p>Note time, date, names, who information shared with and when etc.</p>	<p><i>Does information on its own or in combination with other information already known indicate that the child is suffering significant harm? NB refer to Working Together 2013 definitions of abuse; 'Worried about a child?' poster; 'Signs and Symptoms' handout; WSCB Thresholds for Intervention document.</i></p> <p><i>If yes, refer to Children's Social Care. Inform parents unless doing so is likely to increase risk of significant harm.</i></p> <p><i>If unsure, seek consultation with Children's Social Care or Education Safeguarding Manager.</i></p> <p><i>If no, discuss with parents; consider and discuss positively with parents/young person initiation of CAF process in order to ensure child's needs are properly assessed and understood and to co-ordinate early help. If CAF not required/appropriate, consider whether referral to single agency (e.g. school counsellor, School Nurse, Educational Psychologist) is appropriate; monitor; and record monitoring arrangements.</i></p>
<p>Parents informed</p> <p>Yes/ no</p> <p>and reasons</p>	
<p>Outcome</p> <p>Record names of individuals/agencies who have given you information regarding outcome of any referral (if made)</p>	
Where can additional information regarding	

child/ incident be found? (e.g. pupil file, serious incident book)	
Signed	
Printed Name	
Date	

46. Appendix II – Signs and Types of Abuse

A. Types of Abuse

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

Sexual abuse: involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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 and 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 nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes (often referred to as the sharing of nudes/semi-nudes, or sexting –

see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

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

Child-on-child sexual violence and/or harassment: (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.

Harmful sexual behaviour (HSB): Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term "harmful sexual behaviour" is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. HSB can, in some cases, progress on a continuum. This is consistent with the Hackett Continuum, which distinguishes between developmentally normal, inappropriate, problematic, abusive and violent sexual behaviours.

The Foundation will respond to all signs, reports and concerns of HSB, sexual harassment and sexual violence, including where behaviour falls at the lower end of the continuum. Early intervention in inappropriate such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.. Sexual behaviour between children may 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 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.

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

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sharing of nudes'.

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

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

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

Upskirting: Upskirting is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, 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 gender can be a victim.

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); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious violence: All staff are aware of 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;
- 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; and/or
- unexplained gifts or new possessions (which may also be a sign of the child being at risk of CCE or CSE).

Being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery increases the likelihood for involvement in serious violence. Violence can often peak in the hours just before or after schools, when pupils are travelling to/from school.

Staff should be aware that children who are involved in committing violence may themselves be victims in need of support. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff must report any concern about a child carrying or using a weapon, or expressing intent to do so, to the DSL immediately. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support. Practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the “what works” centre for preventing violence. Further guidance for schools includes: Home Office’s Criminal exploitation of children and vulnerable adults: county lines guidance; The Youth Endowment Fund (YEF) practical guidance for schools and colleges and an accompanying self-assessment tool.

The Home Office and Ministry of Justice's *Government Guidance for Child Knife Possession Offences*, outlines the Government's expectations when a child is found in possession of a knife or bladed article.

Specific safeguarding issues: All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

- child missing from education;
- child missing from home or care;
- child sexual exploitation (CSE);
- behaviours linked to drug taking, alcohol abuse and truanting
- bullying including cyber-bullying;

- domestic abuse;
- fabricated or induced illness;
- faith abuse;
- female genital mutilation (FGM);
- forced marriage;
- gangs and youth violence;
- gender-based violence/violence against women and girls (VAWG);
- mental health;
- private fostering;
- radicalisation, extremism and terrorism;
- Sharing of nudes;
- child on child abuse
- teenage relationship abuse;
- trafficking
- SEND.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in sexual or any criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into 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 persons (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 occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

Some of the following signs may be indicators of sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;

- 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.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse. CSE is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking.

Group-based child sexual exploitation: Group-based is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes, for example, introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child, or allowing their property to be used for sexual activities with a child. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

The below CCE indicators 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.

The DfE has published guidance on this entitled “*Child sexual exploitation: guide for practitioners*”. The Children’s Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

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

The Foundation teaches children about consent and the risks of CSE in the Princethorpe REAL time programme and RSE curriculum for Year 6 at Crackley Hall and Crescent School. A common feature of CSE 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.

All staff are made aware of the indicators of CSE and will manage any concerns in accordance with the safeguarding procedures set out in this Policy. The DSL will consider the need to make a referral to MASH, Multi Agency Support Hub as with any other child protection concern and with particular reference to Warwickshire Safeguarding Children Board’s Child Sexual Exploitation procedures. Parents will be consulted and notified as above (where appropriate). Following a referral to local authority 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 local authority Children’s Social Care as appropriate.

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. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. 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. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

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. CCE and CSE can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. A relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

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

County lines: is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, 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 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.

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:

- who go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim or 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 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.

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. A referral to the National Referral Mechanism should also be considered.

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.

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

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA. It can include multiple perpetrators and may include non-violent forms of abuse.

All forms of so called HBA are abuse (regardless of the motivation), and staff will manage any concerns in accordance with the safeguarding procedures set out in this Policy.

FGM: comprises all procedures involving 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 may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

To give an example of indications that a girl has already been subjected to FGM:

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

If staff have a concern that a pupil may be at risk of FGM or has suffered FGM, they should speak to the DSL who will, where appropriate, activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and local authority Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve local authority children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this Policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the school's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

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

Schools and colleges can play an important role in safeguarding children from forced marriage. 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 on gov.uk and 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.

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

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

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

Even very young children have been exposed, in rare circumstances, to radicalisation, extremism or terrorism at home and elsewhere including online. As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development, they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas.

Our Schools also have responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Our Schools are

committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. We promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and how to support them. There is no single way of identifying a child is likely to be susceptible to radicalisation into terrorism, but there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility. Similarly, radicalization can occur through different methods such as online. 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 may include making a Prevent referral. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern. Any Prevent referral should also be accompanied by a referral to Family Connect.

We recognise the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. The DSL will act proportionately and will make appropriate referrals to the Police Prevent team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support. The school will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation.

In the event of a child leaving, 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.

The school expects all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that hire school premises to behave in accordance with this Policy and the Staff Code of Conduct, and will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website www.educateagainsthate.com informative and useful. The website is designed to equip school and college leaders, teachers 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 and college leaders.

Special Educational Needs and/or Disabilities: Pupils with SEND or certain medical or physical health conditions may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Pupils with SEND or health conditions are three times more likely to be abused by their peers. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding - 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

To address these additional challenges, the Schools have put in place additional pastoral support measures which can be located in the **SEND Policy**.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL and the Head of Learning Support/SENCO as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

Safeguarding children with medical conditions: The fact that there has been an incident relating to the management of a child's medical condition or allergy would not in itself warrant a referral to local safeguarding partners. . The DSL will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the child at risk. The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Further information can be found in the DfE statutory guidance on supporting Pupils at School with Medical Conditions. and Allergy safety in schools.

Young carers: A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry. Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age and which may be impacting on their attendance, attainment, or wellbeing. Concerns about young carers should be discussed with the DSL.

Lesbian, Gay, Bi or Trans (LGBT): A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a pupil who is perceived by their peers to be LGBT or gender questioning (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The Schools endeavor to provide a safe space for LGBT children to speak out or share their concerns with trusted members of staff. The Schools will exercise caution and will consider the broad range of needs that children may have, in partnership with parents where appropriate.

At Princethorpe Pupils can speak to their Head of house, tutor or a member of the medical centre team. At Crackley Hall and Crescent pupils can speak to their form teacher.

Children who are questioning their gender: When supporting a gender questioning child, the Foundation will not initiate any action. The Foundation will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender. Staff will not adopt any changes relating to social transition unless a decision has been made by a school or college and a child's parents or carers have been involved. Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

The Foundation I complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The School does not permit children to use toilets designated for the opposite biological sex. The School has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

Further guidance on single-sex spaces, sport, and boarding accommodation is set out in Part two of KCSIE (September 2026).

Children and the court system: Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such pupils and report any concerns to the DSL or DDSL in accordance with this Policy. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

Children with family members in prison: Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such pupils and report any concerns to the DSL or DDSL in accordance with this Policy. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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. Many schools provide outdoor-safety lessons run by teachers or by local Police staff. It is important that lessons focus 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.

Domestic Abuse: Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. The Domestic Abuse Act 2021 introduced 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 captures a range of different abusive behaviours, including but not limited to, physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking. 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.

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.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern in accordance with the procedures set out in this Policy. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help. The Foundation works in partnership with Warwickshire Police and Warwickshire Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass with alerts sent to the appropriate DSL and recorded against the specific Encompass category in CPOMS as well as any other relevant categories. It is not advisable to discuss this incident with the child, their parents, or any involved parties. Doing so may unintentionally increase risk, escalate tensions at home, or retraumatise the child. Instead, offer silent or open support, monitor for changes in behaviour or wellbeing, and follow usual safeguarding procedures if further concerns arise. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

When the Police attend any incident of domestic violence or abuse in any household in which a pupil lives, the relevant Head and the DSL will receive a confidential and secure email notifying them simply that there has been an incident, and that the child may need support. On receipt of any such notification, the Head and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due kindness, care and sensitivity; information will be shared on a need-to-know basis. In addition to supporting children, the process means that the Foundation will also be in a position to offer parents and carers support as appropriate. The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The school should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL 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 who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods and/or where the absences are unexplained are potential indicators of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the school's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who are absent which can be found in the **Missing Child and Absence Policies**. Action should be taken in accordance with this Policy if any absence of a pupil from the school gives rise to a concern about their welfare. The Foundation's Policies support 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.

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. Many schools provide outdoor-safety lessons run by teachers or by local Police staff. It is important that lessons focus 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.

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 Schools may refer some parents and carers to this service where appropriate

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 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.

Looked after children: Looked after children (and previously looked after children) are a particularly vulnerable group. The Schools will ensure that prompt action is taken when necessary to safeguard these children and that staff have the skills, knowledge and

understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority. *The designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs are met is the DSL who is the nominated person in charge of Looking After Children and can be found in the Key Contacts Section 3.* The Schools ensure that the designated member of staff receives appropriate training in order to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

Children staying with host families: The Schools may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the Schools follow the guidance in KCSIE, Annex C to ensure that hosting arrangements are as safe as possible. Full details can be found in the Foundation's Safer Recruitment Policy on the respective school website.

Mental health: All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

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

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people. The NHS Every Mind Matters website also contains helpful information and advice about Looking after a child or young person's mental health. **Modern Slavery:** Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. Further information and training for professionals on exploitation and modern slavery is available here - Modern slavery training:

resource page - GOV.UK The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance Modern slavery: how to identify and support victims - GOV.UK. Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian (ICTG)¹. ICTGs provide advocacy for children and help to promote and support their recovery.

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 a deputy), 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.

B. 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.

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 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;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their schoolwork;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development;
- have frequent, repeated and/or unexplained absences from school;
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

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

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.

Child on child abuse: See **Section 25** of this Policy on the Foundation's procedures for responding to concerns about child-on-child abuse.

Child-on-child abuse is abuse by one or more children against another child and that it can happen both inside and outside of school or college and online. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include (but not limited to): bullying (including cyber bullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships between peers ('teenage relationship abuse'); physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm); sexual violence (such as rape, assault by penetration and sexual assault, and this includes 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; consensual and non-consensual sharing of nude and semi-nude images and/or videos; upskirting; and 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).

It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The Foundation also recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be "victims" and boys "perpetrators").

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to
- the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic

- attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

Sexual violence and sexual harassment, as a type of child-on-child abuse, may overlap and can occur online and offline (both physical and verbal). Examples of sexual harassment include sexual comments sexual “jokes” or taunting; physical behaviour such as deliberately brushing against someone; non-consensual sharing of sexual images (especially around group chats); sharing of abusive images and pornography to those who do not wish to receive such content; abusive, harassing and misogynistic messages and sexualised online bullying.

47. Appendix 3: Remote Education

A. Context

This has been drawn up in light of supplementary safeguarding and remote education guidance issued by the DfE and *KCSIE*. The Foundation will continue to provide remote education to allow pupils, who are well enough to learn, to keep pace with their education when in-person attendance in school is either not possible or contrary to government guidance.

B. The Designated Safeguarding Lead (and Deputies)

The DSL and DDSs for each school are named in the main Safeguarding Policy. The Foundation will provide the DSL and DDSs with additional time to enable them to respond and provide support to those children working remotely where there are safeguarding and welfare concerns.

C. School Attendance

The Foundation's normal attendance and absence monitoring procedures apply. Where a pupil is unable to attend school, the Foundation will have due regard to guidance issued by the DfE in relation to school attendance and recording of such absences.

The Schools will maintain a register/database of those children who are out of school and will keep a record of and monitor engagement with remote learning.

D. Remote Arrangements

Where the pupil is receiving education remotely, the DSL or Pastoral Deputy Head will be notified and will identify the nature and frequency of contact the child to help promote their safety and wellbeing. This might include phone calls, text contact, Skype or home visits. The child's engagement in remote lessons will also be monitored. The DSL will also consider if a targeted plan of support is required, which will be recorded on the child's safeguarding file and regularly reviewed.

All Foundation policies including the ***Safeguarding Policy, Staff Code of Conduct*** and ***ICT Acceptable Use Policy*** must be followed at all times both in face to face and electronic communication with pupils and parents/carers.

Staff should also have regard to government guidance on remote teaching (including Annex B of *KCSIE*, which includes a dedicated collection of resources to support safe remote education, virtual lessons and live streaming). In addition, where education is being provided remotely:

- The school will request and obtain written consent from parents/carers before staff communicate with children online.
- All communications with parents and pupils should take place in school hours as much as possible and via school email accounts and devices.
- Staff must not share personal information and must use Foundation/service owned technology and accounts (e.g. not personal email accounts) for the delivery of remote lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used. School leaders may randomly sample recorded lessons in order to safeguard pupils/students and staff and to ensure that policies are being followed.
- If staff need to deliver lessons/tutorials on a one-to-one basis or communicate with children who are not attending school via video chat, they will speak to parents/carers before lessons commence and at the end of lessons before logging off.
- The school will consider whether one-to-one sessions could be appropriate, for example, to provide pastoral care or provide additional support for those who are vulnerable or have SEND (which will be discussed and approved by the senior leadership team to assess any risks).
- Pupils will be encouraged to speak up if they come across something worrying online. Pupils will be reminded to ensure their logins and passwords are secure
- It is important that all pupils, parents and staff understand the reporting routes to raise any safeguarding concerns in relation to remote online education.
 - Princethorpe:
 - For pupils this is their tutor or Head of House;
 - For parents this is their child's tutor or Head of House;
 - Crackley Hall
 - For pupils this is their form tutor, Phase Leader or Pastoral Deputy;
 - For parents this is their child's form tutor, Phase Leader or Pastoral Deputy;
 - Crescent
 - For pupils this is their form tutor, Phase Leader or Pastoral Deputy;
 - For parents this is their child's form tutor, Phase Leader or Pastoral Deputy;
- It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record that following normal safeguarding procedures. All such concerns must be brought to the attention of a DSL and dealt with by a DSL as per the main Policy in the normal way.
- The school will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Any safeguarding concerns, suspicions or disclosures regarding a child at home must be acted on immediately in accordance with the Foundation's safeguarding procedures.

The Foundation will continue to have regard to its data protection obligations when processing personal data, including ensuring pupils, staff and parents are provided with sufficient information about any personal data captured during lesson recordings.

It is very unlikely that home visits will take place unless exceptional circumstances apply (such as where it is not possible for arrangements to be put in place to enable the school to make contact with the child and their family remotely) and following an appropriate risk assessment.

E. Safeguarding arrangements

The Foundation recognises that school is a protective factor for children and young people and that the extraordinary circumstances created by the COVID-19 virus may continue to affect the mental health of some pupils/students and/or their parents/carers: some pupils may experience a variety of emotions such as anxiety, stress or low mood. All staff will be vigilant to this and when a response may be required, in accordance with the Foundation's **Safeguarding Policy**. All staff will maintain an awareness of those matters in communications with children and their parents/carers including when setting expectations of pupils' work when they are at home. **All staff must follow the procedures in the Safeguarding Policy if they**

have any concerns about a pupil's welfare, irrespective of whether they are in school or learning remotely.

F. Online safety

The Foundation is committed to providing children with a safe environment in which to learn (including online) and supporting parents with online safety (including emphasising the importance of pupils keeping log in credentials and passwords safe). This includes encouraging parents to provide age-appropriate supervision for their child(ren)'s use of the internet; talking to their children about not accessing age-inappropriate material on devices; knowing who their children are talking to online; setting up age-appropriate parental controls on devices; ensuring internet filters block malicious websites. As part of this, the school will ensure that parents are aware of what their children are being asked to do e.g. what sites they are being asked to use and which staff their child will interact with.

Parents should note that the Foundation is unable to filter activity on devices not owned by the Schools. Parents may find it useful to refer to <https://www.internetmatters.org/blog/parental-controls/broadband-mobile/> for guidance on putting some restrictions in place to keep children safe.

Parents may also find it helpful to read guidance on keeping their children safe online, which includes:

- [support for parents and carers to keep children safe from online harm](#)
- [support to stay safe online](#)
- [Thinkuknow](#) provides advice from the National Crime Agency (NCA) on staying safe online
- [Childnet](#) which offers a toolkit to support parents to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Internet matters](#) provides guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [Let's Talk About It](#) has advice for parents to keep children safe from online radicalisation
- [UK Safer Internet Centre](#) has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services
- [NSPCC](#) has advice on setting up parental controls, tips on how to talk to children about online safety, including the risk of sharing and receiving nude images and how to support children if they have seen something online that has upset them

Where pupils/students are using ICT equipment in school, appropriate supervision will be in place as normal.

Below are other issues that staff need to take into account when delivering virtual lessons, especially where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- Ensure appropriate privacy settings are in place.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the Foundation's ICT manager/coordinator for communication with pupils/students
- Staff should record the length, time, date and attendance of any sessions held.

G. Records

A record of all communications with the child, parents/carers and practitioners in partner agencies will be kept on the child's safeguarding file (*including telephone calls, emails, other online communication, video conversations and virtual meetings), as appropriate.