Waterside School

Safeguarding and Child Protection Policy

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1. Introduction

Waterside School is committed to establishing and sustaining a strong culture of safeguarding in which the welfare of learners is paramount, and safeguarding is recognised as everyone's responsibility (KCSIE 2026, Part One, paras 1–3; Ofsted EIF – safeguarding culture). Leaders and staff understand their statutory duties to safeguard and promote the welfare of learners and ensure that these responsibilities are embedded consistently across all aspects of school life.

As a specialist independent SEND provision, the school recognises that learners may be at increased risk of harm due to additional learning needs, communication differences, previous adverse or traumatic experiences, or increased reliance on adults for care and support (KCSIE 2025, Part One, para 18). Leaders take these vulnerabilities into account when designing systems, training staff, and implementing safeguarding arrangements. Safeguarding practice is trauma-informed, child-centred, and responsive, enabling learners to feel safe, supported, and understood.

The purpose of this Safeguarding and Child Protection Policy is to ensure that learners are protected from harm and that their welfare, health, and safety are promoted effectively and proactively in line with statutory guidance and best practice (KCSIE 2026, Part One, paras 4–10). The school provides a safe, structured, and nurturing environment where learners develop positive, trusting relationships with adults and are supported to engage in learning and personal development.

Waterside School promotes a culture of vigilance, openness, and professional curiosity (KCSIE 2026, Part One, paras 11–16). Staff are trained to recognise that safeguarding concerns may present in a variety of ways, including changes in behaviour, emotional wellbeing, communication, or attendance. Concerns are taken seriously, recorded accurately, and acted upon promptly and effectively. Staff understand the importance of early identification, timely intervention, and working in partnership with other agencies to secure the best outcomes for learners.

Learners are encouraged and supported to express concerns, worries, or disclosures in ways that are accessible and appropriate to their individual needs. The school ensures that learners know how to seek help and that they are listened to and believed. The voice of the learner is central to safeguarding practice, and their welfare remains the overriding priority in all decision-making.

This policy applies to all staff, proprietors, governors, volunteers, contractors, and visitors and is implemented consistently across the school (KCSIE 2026, Part Two, paras 55–58). It meets the requirements of the Independent School Standards, particularly Part 3 (Welfare, Health and Safety of Learners), and reflects statutory guidance including *Keeping Children Safe in Education* (2026) and *Working Together to Safeguard Children* (2023), alongside local Safeguarding Children Partnership procedures.

The Designated Safeguarding Lead (DSL) has appropriate status, authority, time, and training to fulfil their role effectively and is supported by trained deputies (KCSIE 2026, Part Two, paras 59–74). Safeguarding arrangements are monitored and evaluated by leaders to ensure they are effective, well-understood, and continuously improved. This policy is reviewed regularly and formally at least annually during the autumn term, or sooner where required in response to incidents, changes in legislation, or emerging risks.

Parents and carers are kept informed of the school's safeguarding responsibilities and procedures through the publication of this policy and ongoing communication (KCSIE 2026, Part One, paras 8–10). Safeguarding arrangements are subject to inspection by Ofsted under the leadership and management judgement and contribute directly to judgements relating to learners' personal development, behaviour, and welfare.

This policy is available on the school website. All staff and volunteers are required to read, understand, and confirm in writing their compliance with this policy before working with learners (KCSIE 2026, Part One, paras 11-12). Safeguarding is a shared responsibility, and the school actively engages the wider school community (including learners where appropriate, parents, carers, and staff) in shaping and strengthening safeguarding practice.

The school recognises that safeguarding concerns may arise both online and offline and that these forms of harm are not mutually exclusive (KCSIE 2026, Part One, paras 30–49; Annex B). Leaders ensure that systems are in place to identify, assess, and respond to risk in a coordinated, proportionate, and child-centred way across all contexts.

1.1 Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all learners. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff, volunteers, and contractors and are consistent with statutory guidance and those of the locally agreed multi-agency safeguarding arrangements put in place by the local Safeguarding Children Partnership.

1.2 Policy Principles

Safeguarding and promoting the welfare of children is everyone's responsibility and is central to the work of Waterside School. All adults who encounter learners have a vital role to play in keeping them safe. To fulfil this responsibility effectively, all safeguarding practice at Waterside School is child-centred and trauma-informed, ensuring that the best interests of the learner are always the paramount consideration (Keeping Children Safe in Education, DfE, 2026).

As a specialist SEND school, Waterside School recognises that learners may be more vulnerable to harm due to communication differences, additional needs, previous adverse experiences, or increased reliance on adults. Safeguarding arrangements therefore reflect these vulnerabilities and are embedded within a culture of vigilance, openness, and professional curiosity, in line with the Ofsted Education Inspection Framework and the Independent School Standards (Part 3).

1. Safeguarding is everyone's responsibility. All staff, regardless of role or seniority, are professionally accountable for their actions and decision-making in relation to keeping learners safe. Safeguarding is not an additional responsibility but an integral part of everyday practice and professional conduct (KCSIE 2026; Early Help to Child Protection).

2. The Designated Safeguarding Lead (DSL) and Deputy DSLs access relevant training provided by Coventry City Council and other approved providers. Leaders ensure that all staff are **trained to identify learners who may benefit from Early Help and understand their role in providing support at the earliest opportunity**. Early Help focuses on putting the right support in place at the right time to prevent concerns from escalating and to reduce the likelihood of harm re-occurring. Early Help may be required at any stage of a child's life and is an essential part of the day-to-day work of all professionals working with children and families in Coventry.

3. Waterside School recognises that its responsibility to safeguard and promote the welfare of learners is of paramount importance. Leaders ensure that safeguarding systems, policies, and practices are effective, well-understood, and consistently applied across the school, in line with the Independent School Standards.

4. All learners have an equal right to protection from harm, regardless of age, gender, disability, special educational needs, culture, race, language, religion, sexual identity, or background. Safeguarding practice at Waterside School is inclusive and responsive, ensuring that barriers to communication, disclosure, or engagement are actively reduced.

5. All staff have an equal responsibility to act on any concern, suspicion, or disclosure that may indicate a learner is at risk of harm, whether at home, in the community, online, or within the school. Staff understand that learners who feel safe are better able to engage, learn, and make progress, and that safeguarding underpins all aspects of personal development and wellbeing.

6. Staff at Waterside School are well-placed to notice changes in learners' behaviour, presentation, communication, emotional wellbeing, or attendance, which may indicate abuse, neglect, exploitation, or radicalisation. Learners may also choose to share concerns with trusted adults in school. All staff are trained to be approachable, to listen actively and without judgement, and to respond in a calm, supportive, and trauma-informed manner. Concerns are recorded accurately and acted upon promptly to ensure timely and effective safeguarding responses, including the provision of Early Help where appropriate.

7. All staff maintain **a culture of vigilance** and adopt an attitude of ***"it could happen here"*** in relation to safeguarding. Professional curiosity is actively encouraged, and staff are expected to question, reflect, and seek advice when concerns arise. When making decisions, staff always act in the best interests of the learner.
8. Where there is a risk of immediate or serious harm, a referral will be made without delay to Coventry City Council Children's Social Care and/or the Police. Any individual can make a referral. Staff are encouraged to inform the DSL or a member of the senior leadership team as soon as possible following a referral. Where concerns do not appear to be improving, staff are expected to escalate their concerns, including challenging decisions where necessary, and may raise concerns with the Headteacher. Staff are also aware that they may seek advice or make referrals directly to the local authority safeguarding team. Whistleblowing procedures are clearly communicated, and staff are provided with contact details for the Coventry City Council LADO and the NSPCC Helpline.

9. All staff are professionally accountable and adhere to the Staff Code of Conduct. Any concerns or allegations relating to staff conduct, including low-level concerns or staff wellbeing issues, are reported promptly and managed in line with statutory guidance. Leaders promote a culture of openness, transparency, and trust, recognising that sharing concerns at the earliest opportunity is essential to maintaining a strong safeguarding culture and protecting learners effectively.

1.3 Policy Aims

The aims of this policy are to:

- Ensure all staff understand their safeguarding and child protection responsibilities and are confident in carrying them out.
- Promote consistent, high-quality safeguarding practice through training, supervision, monitoring, and continuous improvement.
- Demonstrate Waterside School's clear commitment to safeguarding and child protection to learners, parents, carers, staff, and partner agencies.
- Ensure compliance with statutory guidance, including *Keeping Children Safe in Education* (2025), and the Independent School Standards (Part 3).
- Support the school's safeguarding portfolio and provide clear evidence of a strong safeguarding culture for inspection purposes.
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Waterside School is committed to acting in accordance with *Keeping Children Safe in Education* (KCSIE) 2026. This policy should be read alongside Part One and Annex B of KCSIE and in conjunction with local safeguarding procedures issued by Coventry City Council.

2. Statutory and Regulatory Framework

Waterside School recognises its statutory duty to safeguard and promote the welfare of all learners. In accordance with Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 (as amended), the Governors ensure that effective arrangements are in place to safeguard and promote the welfare of children who are learners at the school. These arrangements are implemented consistently and are subject to regular monitoring and review, in line with the Independent School Standards (Part 3 – Welfare, Health and Safety of Learners). The Teachers' Standards require all teachers, including headteachers, to have regard for the need to safeguard learners' wellbeing and to uphold public trust in the profession through their professional conduct. At Waterside School, safeguarding responsibilities are understood as an integral part of professional practice for all staff and leaders, regardless of role.

The statutory guidance *Working Together to Safeguard Children* (DfE, 2023) sets out the legislative requirements and expectations for all agencies, including schools, to work together to safeguard and promote the welfare of children. This guidance provides the framework for local safeguarding arrangements led by the three safeguarding partners: Coventry City Council (as the local authority), the relevant health bodies, and the Police. Waterside School works in partnership with Coventry City Council and other agencies to identify need early, share information appropriately, and respond effectively to concerns to secure the best possible outcomes for learners.

The statutory guidance *Keeping Children Safe in Education* (KCSIE) 2026 is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015. Waterside School has regard to this guidance in full when carrying out its duties to safeguard and promote the welfare of children.

2.1 Staff Responsibilities and Training

All staff at Waterside School are required, as a minimum, to read and understand Part One of *Keeping Children Safe in Education* (2026). The Governors and senior leaders, working closely with the Designated Safeguarding Lead (DSL), ensure that staff who do not work directly with learners read Part One, based on a clear assessment of what is most effective in enabling staff to fulfil their safeguarding responsibilities.

All staff who work directly with learners are required to read Part One of KCSIE 2026. This includes, as a minimum, all school leaders, teaching staff, and staff with defined pastoral, care, or safeguarding responsibilities. Robust systems are in place to ensure that staff understand their roles, know how to identify safeguarding concerns, and are confident in taking timely and appropriate action.

Safeguarding training at Waterside School is ongoing, regularly updated, and trauma informed. It reflects the additional vulnerabilities of learners with SEND and supports staff to recognise how safeguarding concerns may present through behaviour, communication, emotional regulation, or attendance.

2.2 Definition of Safeguarding

In line with *Keeping Children Safe in Education* (2026), safeguarding and promoting the welfare of children at Waterside School includes:

- Providing help and support to meet learners' needs as soon as problems emerge, including through Early Help.
- Protecting learners from maltreatment, both within and outside the home, including online.
- Preventing impairment of learners' mental and physical health or development.
- Ensuring learners grow up in circumstances consistent with the provision of safe, effective, and nurturing care.
- Taking action to enable all learners to achieve the best possible outcomes.

The non-statutory guidance *What to do if you're worried a child is being abused* (2015) is used to support staff in identifying abuse and neglect and in taking appropriate, proportionate action.

2.3 Human Rights and Equality Duties

Waterside School operates in accordance with the Human Rights Act 1998, which sets out the fundamental rights and freedoms protected by the European Convention on Human Rights (ECHR). The school recognises its duty to act compatibly with these rights when making decisions about learners. Safeguarding practice reflects:

- Article 3: the right to freedom from inhuman or degrading treatment.
- Article 8: the right to respect for private and family life, including physical and psychological integrity.
- Article 14: the right to protection from discrimination.
- Protocol 1, Article 2: the right to education.

Experiences of abuse, violence, harassment, or neglect may breach one or more of these rights, and safeguarding arrangements at Waterside School are designed to prevent such harm and respond effectively when concerns arise.

2.4 Equality Act 2010

Waterside School also fulfils its duties under the Equality Act 2010. Learners are protected from unlawful discrimination based on protected characteristics, including

disability, sex, race, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity. In the context of safeguarding, leaders carefully consider how best to support learners who may face additional risk due to characteristics or vulnerabilities. The school takes positive and proportionate action where necessary and makes reasonable adjustments to ensure that disabled learners and those with additional needs are safeguarded effectively and equitably.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk), it may also be useful for colleges. For further information, see Equality Act guidance/Equality and Human Rights Commission (equalityhumanrights.com).

2.5 Scope of Safeguarding at Waterside School

For the purposes of this policy, safeguarding refers to all aspects of the school's work to keep learners safe and promote their welfare, including but not limited to:

- Supporting learners' physical and mental health, safety, and emotional wellbeing.
- Meeting the needs of learners with special educational needs and/or disabilities.
- Supporting learners with medical conditions and providing appropriate first aid.
- Ensuring safe and well-planned educational visits and off-site activities.
- Providing safe, respectful, and dignified intimate care where required.
- Maintaining a strong focus on online safety and digital resilience.
- Ensuring effective site security and supervision arrangements, taking account of the local context.
- Protecting learners from abuse, neglect, exploitation, radicalisation, and harmful behaviours.
- Ensuring clear, effective, and well-understood child protection procedures.
- Working in partnership with Coventry City Council and other agencies to provide coordinated Early Help and contribute to Child in Need and Child Protection plans where required.

Child protection is a core element of safeguarding and refers specifically to the actions taken to protect learners who are suffering, or are likely to suffer, significant harm.

3. Roles and Responsibilities

Waterside School recognises that safeguarding and promoting the welfare of all learners, particularly those with SEND and vulnerabilities, is the **highest priority**. The school maintains clear, accountable, and explicit arrangements for all staff to understand and discharge their safeguarding responsibilities. These arrangements reflect statutory requirements, statutory guidance, and good practice, including *Keeping Children Safe in Education* (KCSIE 2026), *Working Together to Safeguard Children* (2023), the *Education Act 2002*, the *Independent School Standards (2014)*, and guidance from Coventry City Council, the local authority. This policy and associated procedures are **trauma-informed**, recognising the impact of adversity and developmental trauma on children's behaviour, wellbeing, and learning.

3.1 Designated Safeguarding Lead (DSL)

The **Designated Safeguarding Lead (DSL)** is a senior leader with **overall responsibility for safeguarding and child protection** at Waterside School. The DSL has **the authority, status, training, time, funding, and resources** necessary to fulfil this role effectively.

The DSL's role is **explicit in their job description** and includes:

- Leading the school's safeguarding culture, ensuring that safeguarding is central to all practice.
- Acting as the main point of contact for child protection concerns and safeguarding referrals.
- Providing expert advice, support, and guidance to staff regarding safeguarding, child welfare, and child protection.
- Identifying learners who may benefit from **Early Help** and coordinating multi-agency support.
- Managing and maintaining the child protection file, ensuring all records are **accurate, detailed, and securely stored**.
- Participating in strategy discussions, child protection conferences, and multi-agency meetings.
- Ensuring staff are aware of specific risks, including **child-on-child abuse, sexual abuse, online risks, radicalisation, exploitation, and additional vulnerabilities faced by learners with SEND**.
- Maintaining knowledge of online safety measures, including filtering and monitoring systems.
- Ensuring the school contributes to safeguarding plans for learners subject to **Child in Need or Child Protection plans**.

The DSL is trained to recognise **the signs of abuse, neglect, exploitation, and harm**, and to respond appropriately, using a **trauma-informed, child-centred approach**.

3.2 Availability of the DSL

The DSL, or a trained Deputy DSL, will **always available during school hours** for staff to discuss safeguarding concerns.

- Availability is normally **in person** but, in exceptional circumstances, may be via **telephone or secure digital communication** (e.g., Google Meet).
- Arrangements are in place to provide **DSL availability during out-of-hours or off-site activities**.
- Deputies are trained to the same standard and can act in the DSL's absence, but the **ultimate accountability for safeguarding remains with the DSL**.

3.3 Managing Referrals

The DSL ensures that all safeguarding concerns are **promptly and appropriately referred** to the relevant agencies. This includes:

- Referrals to **Coventry City Council Children's Social Care** when a learner is, or may be, at risk of harm.
- Referrals for statutory services for learners who may be a **Child in Need or at risk of significant harm**.
- Referrals to the **Channel programme** for concerns about radicalisation.

- Referrals to the **Police** in line with NPCC guidance when criminal activity is suspected.
- Referrals to the **Disclosure and Barring Service (DBS)** if a person is dismissed or leaves due to harm or risk to a child.

Staff are supported throughout the referral process. The DSL ensures **all referrals are documented, actions recorded, and outcomes monitored**, and ensures staff understand their responsibility to act immediately if they have concerns.

3.4 Working with Others

The DSL ensures **effective multi-agency collaboration** in line with *Working Together to Safeguard Children* (2023) and local safeguarding arrangements.

Responsibilities include:

- Acting as a source of **support, guidance, and expertise** for all staff.
- Liaising with Coventry City Council, the police, health services, and other statutory and voluntary agencies.
- Collaborating with the **Headteacher, SENCo, pastoral leads, ICT leads, mental health leads, school nurses, and other key staff** to ensure learners' needs are addressed holistically.
- Engaging families in a supportive and respectful manner, recognising that families may be facing adversity or trauma.
- Liaising with the **Local Authority Designated Officer (LADO)** regarding concerns which concern a staff or volunteers.
- Attending and contributing to **child protection conferences, strategy meetings, core groups, and multi-agency meetings**, ensuring the school's safeguarding contribution is coordinated and effective.
- develops effective links with relevant statutory and voluntary agencies including local authority safeguarding contacts
- Promoting educational outcomes for learners who have or have had a social worker, ensuring they receive additional academic support and reasonable adjustments, recognising that **the impact of adversity can continue after statutory intervention ends**.

3.5 Information Sharing and Child Protection Records

The DSL is responsible for the school **maintaining comprehensive child protection records**:

- Keeping separate, secure child protection files for each learner.
- Recording concerns, discussions, actions taken, decisions made (including rationales), and outcomes.
- Ensuring that child protection records are **confidential and only accessed by staff with a legitimate need to know**.
- Maintaining multiple emergency contact numbers for every learner.
- Monitoring safeguarding data, including **child-on-child abuse, online risks, and historical concerns**.
- Ensuring secure and timely transfer of child protection files to receiving schools within **five school days** and notifying social workers where appropriate.
- Considering sharing relevant information proactively with the receiving school to ensure the learner receives the right support.

3.6 Raising Awareness and Policy Oversight

The DSL should:

- Ensure all staff, including temporary and part-time staff, understand the **Safeguarding & Child Protection Policy**, their responsibilities, and the **role of the DSL**.
- Ensure policies are **reviewed at least annually** and updated according to statutory guidance and local priorities.
- Ensure the Safeguarding & Child Protection Policy is **publicly accessible** (e.g., via the school website) and that parents understand its importance.
- Staff are informed of **local safeguarding procedures, training opportunities, and updates**.
- Safeguarding information is integrated into planning for curriculum delivery, pastoral support, and learning provision.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.
- inform the headteacher of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations (where the DSL role is not carried out by the headteacher).

3.7 Training, Knowledge, and Skills

The DSL undertakes:

- Initial and refresher training at least **every two years**, including **Prevent duty and trauma-informed practice**.
- Ongoing knowledge updates at least **annually**, including guidance from Coventry City Council.
- Training to understand:
    - Early Help and statutory thresholds
    - Local referral processes and case management
    - Multi-agency safeguarding arrangements
    - Impact of trauma and adversity on behaviour, learning, and wellbeing
    - Online safety risks, particularly for learners with SEND
    - Child exploitation, abuse, radicalisation, and emerging safeguarding issues
- Regular sharing of safeguarding knowledge with staff through **briefings, training sessions, and 'Safeguarding case studies'**.

Training should provide the DSL with a thorough understanding of their role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required.

- understand the importance of the role the DSL has in providing information and support to local authority children social care to safeguard and promote the welfare of children.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand and support the school or college with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.
- obtain access to resources and attend any relevant or update training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- keeps a record of staff attendance at child protection training.

3.8 Supporting Staff

The DSL provides **direct support to staff**, including:

- Guidance during referral processes and safeguarding investigations
- Ensuring staff understand safeguarding indicators, including **neglect, abuse, exploitation, online risks, looked after children, and child-on-child abuse**. Staff can also demonstrate and understand wider safeguarding issues (details in Annex B of KCSIE) and the additional vulnerabilities of children with special educational needs and disabilities or identifying as gender questioning.
- Supporting staff to **collaborate with social workers and other agencies.**
- Promoting staff confidence to act on concerns immediately and appropriately. To understand that if they have any concerns about a child's welfare, they should either by speak to the DSL/DDSL or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.
- Ensuring staff complete safeguarding induction and acknowledge understanding of:
    - The Safeguarding & Child Protection Policy
    - Staff Behaviour Policy (Code of Conduct)
    - Role of the DSL
    - Keeping Children Safe in Education 2026 (Part One, Annex A, Part Five)

3.9 Understanding Learners' Views

The DSL ensures that the school adopts a **child-centred, trauma-informed approach**:

- Staff are encouraged to listen to learners and respect their views and wishes.
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not stop staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication
- Barriers to disclosure (e.g., SEND, language, trauma, or fear) are recognised and addressed.
- Relationships with learners are built on **trust and safety**, enabling learners to share concerns.
- Collaboration with pastoral staff, SENCo, designated teachers for looked-after children, mental health leads, ICT staff, and school nurses is prioritised to safeguard learners with additional vulnerabilities.

3.10 Holding and Sharing Information

The DSL ensures that:

- Information is shared **appropriately and lawfully**, including during transitions between schools or educational settings
- Records comply with the 'data protection laws': **Data Protection Act 2018** and **UK GDPR and the use of Data (Use of Access) Act 2025**
- Child protection records on CPOMS are transferred securely to receiving schools, separate from the main learner file
- Social workers are informed where there is an **open case**
- Any additional relevant information is shared in advance to facilitate support for the learner

3.11 Deputy Designated Safeguarding Leads (DDSLs)

Deputy DSLs are trained to the **same standard as the DSL**.

- Activities of the DSL may be delegated, but **ultimate accountability remains with the DSL**.
- In the absence of the DSL, Deputy DSLs ensure the ongoing safety and protection of learners.
- In the long-term absence of the DSL, a Deputy DSL assumes **full responsibility for all DSL functions**.

3.12 The Governors

The Governors ensure **strategic oversight of safeguarding**:

- Appoints a senior leader as DSL with the appropriate training and status. The **DSL should take lead responsibility** for safeguarding and child protection.

This should include online safety with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

- Ensure the DSL has the appropriate status and authority within the school or college to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- Appoint one or more DDSLs with the appropriate training and status
- Ensure that the DSL role is explicit in the role holder's job description (also that of DDSL) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- Ensure that the DSL or a DDSL is always available during school hours for staff to discuss any safeguarding concerns. If not in person the DSL/DDSL should be via telephone and/or online Meets, or other such media.
- Ensure that the DSL or a DDSL is always available at least via telephone or other media as above during any out of hours/out of term school activities.
- Ensures effective safeguarding policies and procedures, compliant with Coventry City Council and statutory requirements.
- Ensures safer recruitment, including statutory checks and disqualification regulations.
- Develop an induction strategy that ensures all staff, including the headteacher, and volunteers receive information about the school's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction.
- Ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2023.
- Ensure that the school has a child protection policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- Ensure that the school has procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the headteacher and allegations against other children.
- Develop a training strategy that ensures all staff, including the headteacher, and volunteers receive appropriate and regularly updated safeguarding and child protection training (including online safety) and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of the local authority. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- Ensure that all staff, including temporary staff and volunteers, are provided with copies of or access to the school's Safeguarding & Child Protection policy and Staff Behaviour Policy (code of conduct) before they start work at the school.
- Appoint a designated teacher to promote the educational achievement of children in care of the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales; and ensures that the designated teacher has appropriate training.
- Ensure that the school contributes to inter-agency working and plans.

- Ensure that the school provides effective pastoral care and participates in the early help process for learners with additional needs to provide a co-ordinated offer of early help.
- Teach learners about safeguarding and how to always keep themselves safe, including when online, as part of a broad and balanced curriculum.
- Ensures induction and ongoing training for all staff, volunteers, and leaders.
- Oversees allegations management and ensures referral to **LADO and DBS.**
- Submits the **annual safeguarding audit** to the local authority and addresses any identified weaknesses.

3.13 The Headteacher

The Headteacher ensures that:

- Safeguarding & Child Protection policy and procedures are **implemented effectively**
- Adequate resources are provided for DSL/DDSL functions
- Staff are confident to raise concerns through **whistleblowing**
- Staff support social workers and multi-agency processes when Children's Social Care become involved
- Ensures that all staff have the skills, knowledge and understanding necessary to keep children in care and previously children in care safe
- Ensures that the culture of the school supports the provision of effective pastoral care and early help
- Learners receive **trauma-informed safeguarding education** across the curriculum.
- Allegations are referred appropriately to LADO and DBS
    - Acts as, or appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer/trainee teacher/contractor against whom the allegation is made
    - Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the LADO within one working day prior to any internal investigation
    - Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the LADO
- A senior leader is appointed as **case officer** for allegations concerning staff or volunteers

4. Good Practice Guidelines and Staff Code of Conduct

At Waterside School, we prioritise the safety, wellbeing, and positive development of all learners. To ensure we meet and maintain our responsibilities, we set clear expectations for staff conduct and professional behaviour through our **Staff Behaviour Policy (Code of Conduct)**. All staff, volunteers, and temporary workers are required to **read, understand, and sign** this policy before beginning work at the school.

Our expectations are grounded in **trauma-informed practice** and aim to foster a **safe, respectful, and supportive environment**, recognising the specific needs of learners with SEND and other vulnerabilities. Staff are expected to:

- Treat all learners with **dignity, respect, and fairness**, valuing their individuality and lived experiences.
- Model positive behaviour, demonstrating **professional, ethical, and respectful conduct** always.
- Involve learners in decisions affecting their learning, wellbeing, and environment wherever possible, using **developmentally appropriate methods**.
- Promote positive, respectful, and safe behaviour among learners, recognising that trauma may influence responses and interactions.
- Be attentive listeners, fostering **trusting relationships** that allow learners to share concerns safely.
- Remain alert to **changes in behaviour, mood, or demeanour**, which may signal abuse, neglect, exploitation, or mental health difficulties.
- Recognise that challenging behaviour, self-harm, or mental health concerns may be **indicators of trauma or abuse** and respond with care and professional curiosity.
- Read and understand the school's **Safeguarding & Child Protection Policy**, **Staff Behaviour Policy**, and guidance on wider safeguarding issues, including bullying, physical contact, criminal and sexual exploitation, extremism, online safety, and information sharing.
- Seek learners' **consent before initiating physical contact**, for example when assisting with personal care, PE activities, or first aid, and respect learners' personal boundaries.
- Maintain **professional standards of communication**, avoiding sexualised, derogatory, or discriminatory language.
- Actively challenge sexual violence and harassment and never dismiss harmful behaviour as "banter" or "part of growing up". Staff must challenge behaviours such as grabbing, inappropriate touching, or sexualised gestures and make clear these actions are unacceptable.
- Recognise that some learners' personal or family circumstances may **increase their vulnerability** to abuse or neglect.
- Apply reasonable force or physical intervention **only as a last resort**, in line with school policy, Local Authority guidance, and a trauma-informed approach.
- Report any concerns about a learner's safety immediately to the **DSL/DDSL**, or where necessary, to **Police or Children's Social Care**.
- Follow the school's guidelines for professional communication with learners, including social media and electronic communications.
- Report **any allegations against staff, volunteers, or other adults** working with children to the **Headteacher**; allegations involving the Headteacher are reported directly to the **Governors**.

5. Abuse of Position of Trust

All staff understand that a professional relationship with a learner carries a **position of trust**. A breach occurs when a staff member misuses this trust through inappropriate behaviour or abuse of power.

Staff are aware that under the **Sexual Offences Act 2003**, it is a criminal offence for anyone in a position of trust (over 18) to engage in a sexual relationship with a person under 18, regardless of consent. Staff conduct must always be **beyond reproach**, with clear boundaries maintained between learners and staff.

6. Children Who May Be Particularly Vulnerable

Some learners are more vulnerable to abuse or neglect due to a combination of social, personal, or developmental factors. At Waterside School, we adopt a **trauma-informed approach** and give special attention to learners who may be at higher risk, including but not limited to:

- Learners with **disabilities, SEND, or mental health needs**
- Young carers
- Children affected by parental substance misuse, domestic abuse, or parental mental health issues
- Learners looked after by the Local Authority, previously looked after, or living away from home
- Children receiving support from social workers
- Learners vulnerable to bullying or engaging in bullying behaviour
- Children living in temporary, chaotic, or transient home environments
- Learners at risk of discrimination or maltreatment due to race, ethnicity, religion, disability, or sexuality
- Learners at risk of **child sexual or criminal exploitation, gang-related violence, serious violent crime, FGM, forced marriage, or radicalisation**
- Children who do not speak English as a first language

We provide safeguarding information in **accessible formats and community languages** where appropriate to ensure all learners and families understand the support available.

7. Children with SEND or Mental Health Needs

Learners with SEND or mental health difficulties face additional safeguarding challenges. Staff are trained to recognise and respond to **potential barriers**, including:

- Assumptions that indicators of abuse (e.g., behaviour, mood, or injury) are solely due to disability or mental health, without further investigation.
- Learners with SEND being disproportionately impacted by bullying or peer group isolation or abuse, often without outward signs.
- Communication barriers that may hinder disclosure or understanding.
- Potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse.
- Need for intimate care or that these children are isolated from others.
- More likely to be dependent on adults for care.

- 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 schools or colleges or the consequences of doing so.

To support learner safety, all learners take part in a weekly **'Personal Progress' session**, during which they are asked: "Do you feel safe in school?" Any disclosures or concerns are recorded and passed to the DSL/DDSL for immediate action.

Education 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

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.

Staff recognise that mental health concerns may **signal wider safeguarding issues**. Staff do not diagnose conditions, but report concerns to the DSL in the same way as other safeguarding concerns.

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

7.1 Children with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners.

A safeguarding referral would only be needed where an incident highlighted 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 a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

Further information is provided in our statutory guidance on supporting Pupils at School with Medical Conditions and Allergy safety in schools.

8. Early Help Process

Staff are often in the best position to identify early signs of concern or need and provide support. **Early Help** is a proactive approach aimed at preventing escalation and ensuring timely interventions.

At Waterside School:

- DSLs are responsible for overseeing Early Help and ensuring timely responses.
- *Keeping Children Safe in Education 2026* emphasises that **all** staff should be aware of the early help process and understand their role in it. Staff are trained to recognise early signs that a learner or family may need support.
- The DSL may delegate the initiation of the Early Help process to an appropriate trained member of the school staff. The DSL remains responsible and accountable for overseeing and managing early help process, but another member of staff could act as lead professional, eg qualified or non-qualified teaching staff, or pastoral staff, as deemed to be appropriate.
- Concerns are recorded in the school's safeguarding system CPOMS and referred to the DSL/DDSL.
- Early Help may involve **pastoral support, coordination with parents, or multi-agency interventions** with consent.

The school follows Coventry City Council's guidance and multi-agency procedures, ensuring collaboration with:

- Early Help Social Workers
- Early Help Team Leaders
- Children's Social Care, where necessary

Early Help is structured, restorative, and family focused. It includes:

- Assessing the child's and family's needs
- Developing a clear action plan with targets, responsibilities, and timelines
- Coordinating support across professionals and agencies
- Regularly reviewing progress and outcomes

Staff are particularly alert to learners who may benefit from early help, including those who:

- Have SEND or mental health needs
- Are young carers
- Are at risk of exploitation, gang involvement, or criminal activity
- Are frequently missing or persistently absent from education
- Experience parental substance misuse, mental health difficulties, or domestic abuse
- Are at risk of honour-based abuse, FGM, or forced marriage
- Have returned home from care
- Have parents or carers in custody

Early Help requires **parental or learner consent**, with secondary-aged learners sometimes able to consent themselves, following government guidance on safeguarding and information sharing.

If concerns escalate or Early Help is declined, the DSL/DDSL will consider a **referral to Children's Social Care** following Coventry City Council procedures to ensure the child receives statutory protection if necessary.

Some children and families may require more targeted support than that offered at the universal and community based Early Help level. The Families First Partnership (FFP) Programme Guide provides a toolkit to assist safeguarding partners set up effective Family Help models to identify children and families who would benefit from more targeted support through Family Help. By Family Help, we mean both targeted early help and support and services delivered under s.17 of the Children Act 1989.

9. Attendance

At Waterside School we recognise that regular attendance is essential for the well-being, safety, and educational progress of all learners, particularly those with SEND. Consistent attendance allows learners to access tailored learning, therapeutic support, and social opportunities in a safe and supportive environment.

Attendance is monitored rigorously by staff, with patterns of absence identified early to prevent escalation. The school work collaboratively with **Coventry City Council Attendance Team** and other relevant agencies to support families where attendance concerns arise.

Early intervention is a key part of our approach. When attendance issues are identified, the school implements a trauma-informed, restorative approach to support learners and families, recognising that absence may be linked to emotional, social, or health-related needs. Our detailed attendance procedures are outlined in the school's Attendance Policy, which is reviewed regularly by the Headteacher.

10. Children who are absent from education

Prolonged or repeated absence from education can be a safeguarding concern and may indicate risks such as neglect, child sexual exploitation (CSE), child criminal exploitation (CCE, including county lines), or other forms of harm. Learners already known to **Coventry City Council Children's Social Care**, such as those with a social worker, child protection plan, or in care, are especially vulnerable when absent from school.
Waterside School staff are trained to identify the early warning signs of risk associated with non-attendance and respond promptly.

Our approach aligns with statutory guidance:

- **Children Missing Education (DfE 2024)**: Ensuring all children are receiving full-time, suitable education.

- **Working Together to Improve School Attendance**: Collaboration with the Local Authority and other agencies when absence may indicate safeguarding concerns.

Children that are missing education (CME) have an increased vulnerability and can be at more of a risk of neglect, abuse, exploitation, radicalisation, and mental health issues. Similarly, staff should also be vigilant to signs that children at risk of travel to conflict zones, female genital mutilation or forces marriage.

Waterside School follows the DfE legal guidance for recording and reporting children who leave their school with an unknown future destination. When a learner has 10 consecutive school days of unexplained absence, without permission with unknown whereabouts, schools and colleges should take all reasonable steps to establish their whereabouts.
If unsuccessful, the school will make an immediate referral to the Local Authority Attendance Team/Service.

We take the following steps when a learner's whereabouts are unknown:

1. Telephone calls to all known contacts (parents, carers, emergency contacts).
2. Letters home (recorded delivery where possible).
3. Liaison with other schools if siblings are registered elsewhere.
4. Home visits where safe to do so.
5. Enquiries with friends, neighbours, and relevant local professionals.
6. Review of any relevant information from social media or other services.

All actions and outcomes are recorded on the learner's safeguarding file. If a learner is located, the school works with **Coventry City Council Attendance Team** and the family to facilitate a safe return to education, including reintegration plans where necessary.

When learners transfer to another school, all educational records are transferred securely, with safeguarding records communicated separately to the receiving school's DSL. Non-standard transitions (e.g., elective home education, medical absence, custody) are reported to **Coventry City Council within five days**, in line with statutory guidance.

At Waterside School, safeguarding and promoting the welfare of learners is embedded within the school's ethos, leadership and daily practice. Leaders and staff recognise that children and young people with special educational needs and disabilities (SEND) may experience additional vulnerability, including increased risk of disrupted education, exclusion, exploitation or becoming missing from education. As such, the school maintains robust, trauma-informed systems to ensure that all learners are safe, visible, and supported at every stage of their educational journey.

The school fulfils its statutory duties under the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and Keeping Children Safe in Education (KCSIE) 2026 by ensuring that all admissions, attendance concerns and removals from roll are managed lawfully, transparently and in close partnership with Coventry City Council.

10.1 Removal from Roll and Local Authority Notification

Waterside School informs Coventry City Council promptly when a learner is removed from roll for any lawful reason, including where a learner:

- transitions to elective home education.
- moves out of the local area.
- remains medically unfit to attend school beyond compulsory school age.
- is detained in custody for four months or more and will not return to the school.
- is permanently excluded.

These notifications are made in a timely manner to enable the Local Authority to discharge its statutory duty to identify children missing education and to ensure that no child is left without appropriate educational provision or safeguarding oversight.

Where parents express an intention to electively home educate, the school adopts a supportive, non-judgemental and trauma-informed approach, recognising that such decisions are often made during periods of heightened stress, unmet need or breakdown in relationships. In line with best practice, parents are encouraged to reflect for a two-week period before a child is removed from roll. During this time, the school work collaboratively with the family and Coventry City Council's SEN and Attendance Service to explore appropriate support, reasonable adjustments and alternative pathways that may better meet the child's needs.

10.2 Non-standard Transition Points

The school notifies the Local Authority within five days of adding a learner's name to the admissions register at a non-standard transition point and provides information as required for learners admitted at standard transition points. Where a learner is expected to attend but fails to take up their place, this is reported promptly to Coventry City Council so that appropriate follow-up can occur.

When a learner leaves the school, leaders ensure that the name of the receiving school and the intended start date are recorded accurately. This ensures continuity of education and reduces the risk of a learner becoming missing from education. Deletions from roll are completed in liaison with the Local Authority and are normally backdated to the first day of absence, in line with statutory guidance.

These procedures are underpinned by strong leadership oversight and a culture where safeguarding is everyone's responsibility. Leaders ensure that staff understand the link between attendance, missing education and safeguarding risk, particularly for learners with SEND. Staff are trained to escalate concerns promptly and to recognise Overall, Waterside School's approach ensures that safeguarding is proactive rather than reactive, relational rather than procedural, and consistently focused on the best interests, safety and wellbeing of every learner, particularly those with complex SEND.

11. Children who run away, or go missing from home/care

Waterside School recognises that children who (repeatedly) run away or go missing are at heightened risk of abuse, exploitation, mental health difficulties, or other harms.

We follow **Statutory Guidance on Children who Run Away or Go Missing (DfE 2014)** and offer to facilitate **Return Home Interviews (RHI)** in collaboration with the Local Authority, ensuring learners are offered a safe space to discuss their experiences within 72 hours of their return.

RHI's are undertaken by practitioners who are independent to facilitate a discussion with the young person that is as open as possible. As soon as the Local Authority receives notification that a young person has gone missing from home or care, a letter will be sent to parents/carers seeking their consent. If the Local Authority has been unable to secure consent from parents/carers, the school and college will contact the parent/carer and seek to secure their consent for the RHI. Direct contact will then be made to make arrangements for the interview.

Consent is sought from the young person and/or parents/carers, with younger learners supported under the **Fraser Guidelines** where appropriate. Staff provide a safe, supportive environment for RHIs, and relevant adults accompany learners as required. Young people (aged 16 and 17 years old) are generally considered to be able to give or withhold consent independently for an RHI. With reference to the Fraser Guidelines, younger children can give consent. However, they if are assessed as not capable of giving their own consent or are withholding informed consent, under the Fraser Guidelines, the school should seek consent from parents/carers for the RHI to go ahead. Schools are advised to seek expert advice if they are unsure as to whether they have the necessary capacity to make such decisions for themselves. Parents/carers may also choose to accompany their child/young person during interviews and the school will facilitate that as appropriate.

12. Helping learners understand and manage risk

All learners at Waterside School are supported to understand risks and develop strategies to keep themselves and others safe. *Keeping Children Safe in Education 2026* requires governing bodies to ensure that children are taught about how to keep themselves and others safe, including online. The curriculum at Waterside School is tailored to ensure it supports the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). This will include an age-appropriate approach to teaching safeguarding as set out in KCSIE 2026 Paragraphs 130, and 133 -136. This is embedded across the curriculum, including:

- **PSHE**, Relationships Education, Relationships and Sex Education (RSE), and Health Education.
- Trauma-informed approaches tailored to the needs of learners with SEND, mental health needs, or other vulnerabilities.
- Discussions that empower learners to recognise risks without causing fear, including online safety, bullying (including cyberbullying), sexual harassment and exploitation, gang involvement, county lines, drugs and alcohol, and radicalisation.

At Waterside School, learners are supported to understand, assess and manage risk through a carefully planned and inclusive PSHE curriculum, alongside Relationships

Education (primary), Relationships and Sex Education (RSE) (secondary) and Health Education (all learners), in line with statutory requirements and the needs of learners with SEND. Learning is reinforced consistently through daily school practice, pastoral support and staff modelling of safe and respectful behaviour.

Our trauma-informed approach recognises that many learners may have additional vulnerabilities linked to communication needs, developmental differences or previous adverse experiences. Teaching about risk is therefore explicit, accessible, repetitive where needed, and adapted to individual learning profiles. Learners are supported to recognise unsafe situations, understand their own feelings and responses, and identify trusted adults who can help them. This approach is empowering and preventative, promoting confidence, autonomy and protective behaviours rather than anxiety or fear, in line with Ofsted's expectations for personal development and safeguarding.

Learners are taught how to behave responsibly, understand boundaries and show respect for themselves and others. Online safety education is a key priority and includes age-appropriate teaching about digital citizenship, safe use of technology, the risks of sharing images or personal information, and how to report concerns. Anti-bullying messages, including cyberbullying and prejudice-based behaviour, are embedded across the curriculum and wider school culture. Learners are routinely encouraged and supported to speak to a trusted adult of their choice if they are worried, reflecting a culture of openness and vigilance.

Learning about risk includes explicit discussion of youth-produced sexual imagery (often referred to as 'sexting'), delivered in a sensitive, factual and developmentally appropriate way. Learners are supported to understand that while some young people may share images within relationships without intending harm, there are significant safeguarding risks, particularly for learners with SEND who may be more vulnerable to coercion, misunderstanding or exploitation. Although this situation may *technically* constitute an offence, 'sexting' of this nature is termed 'experimental sexting' and usually criminalisation of the person in not necessary. Staff are trained to remain alert to indicators of concern, to listen carefully to learners, and to record and report concerns in line with safeguarding procedures, consistent with KCSIE 2026.

Where concerns are identified, staff will speak with the learner in a calm, supportive and non-judgemental manner. The DSL will consider appropriate next steps, including informing parents or carers, unless doing so would place the learner at increased risk of harm. In making decisions, the DSL will apply professional judgement, including consideration of the Fraser guidelines where relevant, about whether to respect a young person's request not to inform their parents/carers.

Please note: In line with statutory guidance, learners under the age of 13 cannot consent to sexual activity, and any imagery involving sexual activity and a child under 13 will be referred to the Police.

Learners are taught about **online safety, consent and healthy relationships** through a carefully sequenced and developmentally appropriate curriculum that reflects their individual SEND needs. Learning includes an understanding of **fundamental British values**, respectful relationships, and how to recognise and respond to **grooming**, coercion and exploitation. Learners are supported to understand how to keep

themselves safe from **all forms of bullying**, including online and prejudice-based bullying, and are taught about **child criminal and sexual exploitation**, including issues of informed consent, youth-produced sexual imagery, substance misuse, gang-related risks and county lines.

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Teaching is delivered in a trauma-informed way that promotes awareness, resilience and protective behaviours, enabling learners to recognise risk and know how and where to seek help. This approach supports a **strong safeguarding culture** where learners feel informed, empowered and listened to. To ensure accessibility and inclusion, each school base provides **alternative reporting mechanisms**, such as worry boxes or digital systems, to support learners who may find it difficult to approach an adult directly. In addition, all learners are issued with a **school email account**, which can be used as a safe and monitored method to share concerns or worries. These arrangements reflect the school's commitment to **listening to learners' voices**, removing barriers to disclosure and ensuring safeguarding systems are responsive to the needs of vulnerable learners, in line with the **Independent School Standards** and **KCSIE 2026**.

12.1 Children who are lesbian, gay, bisexual, or gender questioning

Being lesbian, gay, bisexual or gender questioning is **not in itself a safeguarding risk**. However, learners who identify as, or are perceived by others to be, lesbian, gay, bisexual or gender questioning may be **more vulnerable to bullying, discrimination or harassment**, including child-on-child abuse. This vulnerability can be increased where learners do not feel they have a **trusted adult** with whom they can share concerns.

Waterside School staff work to **develop a feeling of belonging** in our learners, through this we **reduce barriers to disclosure**, promote inclusion and ensure that all learners feel safe, respected and listened to. Learners are supported to access a **safe space** and trusted adults who can provide help, reassurance and guidance.

LGB or safer gender questioning inclusion is embedded within the **statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education curriculum**, supporting learners to develop understanding, respect and positive attitudes, and helping to prevent homophobic, biphobic and transphobic bullying and abuse.
At school level, identified staff such as **key workers, teaching staff, senior leaders and DSL/DDSL** provide targeted and accessible support. Where appropriate, learners are made aware of named adults and how to contact them, reinforcing a culture where learners are confident that concerns will be taken seriously and acted upon in accordance with safeguarding procedures.

13. Support for learners, families, and staff involved in safeguarding

Waterside School recognises that safeguarding concerns affect the whole school community. Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support learners, their families, and staff. All concerns, suspicions and disclosures are **taken seriously and acted upon promptly**. A **named link person**, normally the DSL, coordinates communication and acts as the central point of contact to ensure clarity, consistency and appropriate information-sharing. Where an allegation involves a member of staff, **separate link persons** are appointed to avoid conflicts of interest and to safeguard all parties.

The school responds **sensitively and flexibly** to requests for time, space or adjustments to support emotional wellbeing, recognising the impact of trauma. Information is handled **confidentially**, shared strictly on a **need-to-know basis**, and safeguarding records are **stored securely** in line with statutory requirements.

Where appropriate, learners, families and staff are **signposted to external support**, including counselling and helplines. The school follows its **child protection, whistleblowing, complaints and disciplinary procedures** rigorously and works **co-operatively Coventry City Council Children's Social Care with statutory agencies**, ensuring that safeguarding actions are timely, proportionate and focused on the best interests of the child.

14. Safeguarding concerns and allegations about staff

The school maintains **clear, robust procedures** for managing safeguarding concerns or allegations against any adult working in or on behalf of the school, including employees, supply staff, volunteers and contractors, whether in a paid or unpaid capacity. These procedures are **fully aligned with Keeping Children Safe in Education 2026** and local safeguarding partnership arrangements, and are designed to promote **early reporting, transparency and proportionality**.

Safeguarding concerns are managed under two distinct thresholds:

- **allegations that may meet the harm threshold.**
    - Behaviour that has harmed a child or may have harmed a child.

  - Possible criminal offences against or related to a child.
  - Behaviour towards a child that indicates they may pose a risk of harm to children.
  - Behaviour indicating unsuitability to work with children. This includes behaviour that may have happened outside of school, known as transferable risk.
- **low-level concerns** - allegations/concerns are behaviour inconsistent with staff code of conduct but not meeting the harm threshold.

All concerns are addressed in line with statutory guidance, ensuring that **children are protected**, and that **staff are treated fairly, consistently and with appropriate support**.
Where an allegation may meet the harm threshold, established procedures are followed without delay. Staff who are the subject of an allegation are kept informed of the process and outcomes, and cases are handled **promptly and sensitively**. Suspension is **not an automatic response**; alternative arrangements are considered wherever possible. Where suspension is necessary to ensure a fair investigation and protect all parties, the school provides **ongoing support and a named contact**. The school actively safeguards confidentiality and reminds all stakeholders that **publication of identifying information is prohibited by law**, including on social media. Historical allegations or concerns relating to individuals no longer working at the school are referred to the Police as required.

In accordance with KCSIE 2026, the headteacher refers to the **Local Authority Designated Officer (LADO),** within **one working day,** any allegation where an individual has harmed or may have harmed a child, may have committed a criminal offence, may pose a risk of harm to children, or may be unsuitable to work with children, including where concerns arise from behaviour outside the school setting (transferable risk). Where the allegation concerns the headteacher, responsibility for referral rests with the Governors. Concerns regarding the Governors are referred directly to the LADO.

The school also operates a **clear and effective low-level concerns process**, recognising that low-level concerns are not insignificant and play a critical role in maintaining a **strong safeguarding culture**. Low-level concerns include any behaviour that causes discomfort or falls short of expected professional standards but does not meet the harm threshold. All such concerns are shared with the headteacher or DSL **as soon as possible and within 24 hours**, recorded appropriately, and considered in the context of the staff code of conduct and safeguarding policy.

The headteacher or DSL acts as the **final decision-maker** for low-level concerns, consulting senior leaders where appropriate. Concerns relating to supply staff or contractors are shared with their employers to enable identification of potential patterns of concern. Where there is uncertainty about whether a concern meets the harm threshold, the school seeks **timely advice from the LADO**.

Through these arrangements, the school demonstrates a **culture of vigilance, openness and accountability**, meeting the expectations of prioritising learner safety, staff professionalism and early intervention.

15. Complaints procedure

The school has a clear, transparent and well-publicised complaints procedure which enables learners, parents and carers to raise concerns about poor practice in a safe and appropriate manner. This applies where concerns relate to conduct or practice that does not initially meet the threshold for child protection action but may still impact negatively on a learner's wellbeing, dignity or right to feel safe. Examples of poor practice may include unfairly singling out a learner, inappropriate or humiliating behaviour, bullying, discriminatory conduct or failure to uphold professional boundaries.

Complaints are managed sensitively and proportionately by the headteacher and/or other members of the senior leadership team, in line with the school's published complaints procedure. Safeguarding considerations are integral to decision-making throughout the process. Information about how to raise concerns or make a complaint is shared with parents and learners as part of the school's safeguarding information and is accessible via the school website.

Where concerns are raised by staff, these are managed through the school's Grievance Policy, Staff Code of Conduct Policy or Complaints Policy procedures and are aligned with the low-level concerns framework. Any complaint that escalates or gives rise to a safeguarding concern is immediately managed under the school's safeguarding and child protection procedures, ensuring prompt action to protect learners and comply with statutory guidance.

16. Whistleblowing

Waterside School fosters a strong safeguarding culture in which all adults understand their responsibility to act if they have concerns about the conduct, behaviour or practice of a colleague, volunteer, supply staff member or contractor. Staff are supported to recognise that reporting concerns can be challenging, but that the welfare of the child must always take precedence over professional discomfort or loyalty.

The school's Whistleblowing Policy provides clear routes for raising concerns confidentially and, where necessary, anonymously. Staff are expected to report all concerns, including low-level concerns or behaviours that may indicate a breach of the staff code of conduct, to enable early intervention, maintain professional standards and reduce the risk of more serious harm.

Concerns are recorded and shared promptly using the school's designated reporting systems and are considered by appropriate senior leaders in line with statutory guidance and local safeguarding procedures. Clear escalation pathways are in place for concerns relating to senior leaders, Headteacher, Governors, including direct referral to the Local Authority Designated Officer (LADO).

Staff are reminded of their right to report concerns directly to Children's Social Care or the Police where they believe this is necessary to safeguard a child, and of the availability of external support such as the NSPCC whistleblowing helpline.

Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or e mail help@nspcc.org.uk.
Information is also available on the NSPCC website at:
https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/.

These arrangements ensure concerns are handled fairly, consistently and transparently, reinforcing a culture of accountability and safeguarding vigilance.

17. Staff training

The school ensures that all staff are equipped with the knowledge, skills and confidence required to safeguard children effectively. Safeguarding and child protection training, including online safety, is provided to all staff at induction and is completed before they have any direct contact with learners. This training is regularly reviewed and updated to reflect changes in statutory guidance, local safeguarding arrangements and emerging risks.

Ongoing safeguarding updates are provided at least annually and through regular briefings, staff meetings and written communications, ensuring safeguarding remains a continuous and embedded priority. Training enables staff to recognise signs and indicators of abuse, neglect, exploitation and radicalisation, understand the impact of trauma, and know how to respond appropriately to concerns or disclosures.

Induction training includes detailed coverage of the Safeguarding Policy, Early Help processes, reporting and recording procedures, Staff Code of Conduct, Whistleblowing Policy, the identity and role of the DSL and `DDSLs, and the school's safeguarding response to children missing education. Staff are required to confirm that they have read, understood and will comply with safeguarding policies and expectations. This training may be either in form of official in person training, or policies will be given with the expectation that the staff member will read the policies and undertake to comply with them.

Training places particular emphasis on understanding the increased vulnerability of certain groups, including learners with special educational needs and disabilities, children in care and previously in care, and young carers. Staff are supported to develop professional curiosity and to build trusting relationships with learners, recognising that children may not always disclose harm due to fear, shame, communication difficulties or previous traumatic experiences.

Staff should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

The school ensures that leaders involved in recruitment have completed safer recruitment training and that this training is kept up to date. Supply staff and visiting professionals are provided with safeguarding information on arrival to ensure consistent safeguarding practice across the school. Through these robust arrangements, safeguarding is embedded across leadership, culture and daily practice, meeting the expectations of Ofsted and the Independent School Standards.
All staff receive **induction training** in safeguarding and child protection (including online safety) before working directly with learners. Training is regularly refreshed and updated to reflect:

- Trauma-informed practice.
- SEND-specific safeguarding needs.
- Recognising abuse, neglect, exploitation, and radicalisation.
- Managing disclosures and safeguarding concerns appropriately.
- Procedures for children missing education and online safety.

All staff should be aware that learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL/DDSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, children in care , previously children in care and young carers, as well as risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, child on child abuse, sexual harassment and sexual violence in school, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online.

DSLs and senior leaders attend **safer recruitment training**, with a minimum of two trained staff maintained within the school. Supply and visitors receive Safeguarding guidance upon arrival at the school and sign to confirm they have read it.

Staff are supported to maintain professional curiosity and build trusted relationships with learners, recognising that children may not feel ready or able to disclose abuse, neglect, or exploitation.

18. Safer Recruitment

Waterside School is fully committed to creating and sustaining a **strong safeguarding culture**, where the safety, welfare and emotional wellbeing of learners are prioritised at every stage of recruitment and induction. Safer recruitment practices are embedded across the school and reflect our trauma-informed ethos particularly those with SEND and heightened vulnerability, ensuring that only adults who are suitable, motivated and able to work safely with children are appointed or permitted to volunteer. The school

complies with **Keeping Children Safe in Education (KCSIE) 2026**, the **Independent School Standards**, and the procedures of the **Coventry Safeguarding Children Partnership**.

The school operates robust safer recruitment practices to ensure that all adults working with learners are suitable to do so and that safeguarding is embedded throughout the recruitment process.

Schools are 'specified places' which means that most staff and volunteers will be engaged in Regulated Activity. A fuller explanation of Regulated Activity can be found in Part 3 of Keeping Children Safe in Education 2026.

18.1 Recruitment and pre-employment checks

All applicants are required to:

- Complete a full application form, including a detailed employment history with explanations for any gaps
- Provide **two references**, including at least one from an employer able to comment on the applicant's suitability to work with children
- Provide original evidence of identity, qualifications and professional status
- Provide evidence of their **right to work in the UK**
- Attend a face-to-face interview conducted by a panel of at least two trained leaders or governors

Where shortlisted, the school will:

- Conduct **value-based interview questions** that explicitly explore safeguarding attitudes, professional boundaries, motivation to work with vulnerable children, and understanding of trauma-informed practice
- Carry out **online searches** as part of due diligence, in line with KCSIE 2025, to identify publicly available information that may be relevant to suitability
- Verify mental and physical fitness to undertake the role
- Obtain references prior to appointment wherever possible

18.2 DBS and statutory checks

Appropriate checks are undertaken in line with statutory guidance, including:

- **Enhanced DBS with barred list check** for staff and unsupervised volunteers in Regulated Activity
- **Enhanced DBS checks for Governors**, with barred list checks where Regulated Activity applies
- **Overseas checks** where applicants have lived or worked outside the UK
- **Prohibition from teaching checks** for teaching roles
- **Section 128 checks** for leadership and management roles in an independent school

<u>As per Crime and Policing Act 2026, Volunteers in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity. Thus require an enhanced DBS check with children's barred list information.</u>

Waterside School recognises that as a school, it is a **"specified place"**, and therefore staff and volunteers will be engaged in **Regulated Activity** (as defined in Part 3 and Annex C of KCSIE 2026).

18.3 Safer recruitment governance

- At least **one member of every recruitment panel** has completed accredited safer recruitment training
- The school maintains an accurate and up-to-date **Single Central Record (SCR)** in accordance with KCSIE 2026 and Coventry City Council guidance
- Written assurances are obtained from **supply agencies and third-party providers** confirming that all required checks have been completed to the same standard as direct employment
- Apprentices and trainee teachers are checked either by the school or the training provider, with written confirmation of suitability obtained

18.4 Induction

All new staff and volunteers receive a comprehensive induction before having unsupervised contact with learners. This includes:

- Safeguarding and Child Protection Policy
- Staff Behaviour Policy (Code of Conduct)
- Whistleblowing procedures
- Reporting and recording concerns
- Awareness of the DSL and Deputy DSLs
- Child-on-child abuse, online safety and SEND-specific vulnerabilities

All staff sign to confirm they have read, understood and will comply with safeguarding policies.

19. Site Security and Visitors

Waterside School maintains a safe, calm and structured environment that supports learners' emotional regulation and sense of security.

- All visitors, including contractors, must **sign in**, wear identification, and comply with safeguarding and health and safety requirements
- The Headteacher exercises professional judgement regarding supervision or escorting of visitors
- Learners are never left unsupervised with adults who have not been appropriately checked
- Parents who are simply delivering or collecting their children do not need to sign in.

19.1 Use of premises by external organisations

Where facilities are hired or used by external providers, the Headteacher or Governors should seek assurance that:

- Safeguarding and child protection policies are in place and reviewed
- Safer recruitment and DBS requirements are met
- Safeguarding expectations are included in hire or lease agreements
- Failure to comply results in termination of use

This applies regardless of whether children attending activities are on the school roll.

20. Behaviour Management and Physical Intervention

Waterside School adopts a **trauma-informed, relational and restorative approach** to behaviour, recognising that behaviour is often a communication of unmet need. The Behaviour Policy is reviewed regularly and shared with staff, parents and learners.

20.1 Use of reasonable force

Our Behaviour Policy is set out in a separate document and is reviewed regularly by the members of the Senior Leadership Team. It is shared with all staff before they start working with learners as part of their induction. The policy is transparent to staff, parents/carers and learners.

Waterside School believe that positive handling methodologies should only be used as a last resort, once all other de-escalation procedures have been deployed with the learner. In line with **KCSIE 2026** and **DfE guidance on the use of reasonable force, and Restrictive Interventions**, staff may use reasonable force only where necessary to:

- Prevent harm to the learner or others
- Prevent serious damage to property
- Prevent serious disruption

Any use of force must be:

- Proportionate, necessary and time-limited
- The minimum required
- Never used as a punishment

The school uses the **Team-Teach** approach, with appropriately trained staff only. All incidents are recorded and reviewed by senior leaders to ensure learning, oversight and learner wellbeing.

20.2 Searching and confiscation

The **Designated Safeguarding Lead (DSL)** will work closely with the **headteacher or principal** to ensure they are fully informed of all safeguarding matters, particularly in relation to **ongoing Section 47 enquiries under the Children Act 1989** and any **police investigations**. The DSL ensures that all processes prioritise the **child's welfare, wishes, and feelings**, which are communicated to relevant agencies and professionals. Staff must be aware of statutory requirements, including the provision of an **Appropriate Adult** when a child is involved in police interviews, in line with **PACE Code C (2019)** guidance.

The school follows the statutory guidance in **DfE: Searching, Screening and Confiscation (Advice for headteachers, school staff and governing bodies)** to maintain a **safe learning environment** while upholding children's rights and wellbeing.

- **Consent-based searches:** Staff may conduct a search if the learner **voluntarily consents** to the process. Consent must be sought in a calm,

respectful manner, and learners are informed of the reasons and scope of the search.

- **Statutory power to search without consent:** The **headteacher** and staff authorised by them may search learners or their possessions **without consent** if there are **reasonable grounds to suspect possession of prohibited items**, including:
  - Knives or weapons
  - Alcohol, illegal drugs, or tobacco/cigarette papers
  - Stolen items
  - Fireworks
  - Pornographic material or indecent images of children
  - Any article that could be used to commit an offence, cause harm, or damage property

Additionally, staff may search for items **banned under school rules**, where these items have been explicitly identified as search-worthy in the school's behaviour policy.

Staff are authorised to **confiscate prohibited items** or any item that may **pose a risk to safety or school discipline**. Where there is a **suspicion that a confiscated device contains indecent images of children**, staff must **not examine the device**. The device must be **immediately handed to the DSL**, who will liaise with **Police or First Response/Children's Social Care** for guidance before taking any further action, in accordance with statutory guidance on **viewing and handling imagery of children**. All confiscation actions are **recorded clearly**, including the reason for the search, items confiscated, and any external referrals made. Records are stored securely and shared only with those who **need to know**, in line with safeguarding procedures.

All searches and confiscation procedures are carried out in a **proportionate, respectful, and non-confrontational manner**.
Staff are trained to consider:

- The **potential emotional impact** on children during a search or confiscation
- The importance of **minimising anxiety and preserving dignity**
- The child's **communication needs, additional vulnerabilities, and any SEND requirements**
-

Staff are encouraged to maintain **professional curiosity**, observe behaviour for signs of distress, and liaise with the DSL to determine appropriate support or interventions. Where appropriate, **parents/carers are informed**, unless doing so would **increase risk to the child**, in which case guidance is sought from **Children's Social Care or the Police**.

21. Record Keeping

Accurate, timely and secure record keeping is fundamental to effective safeguarding practice.

Waterside School maintains safeguarding and child protection records in line with **KCSIE 2026**, ensuring:

- Clear summaries of concerns
- Chronological records of actions and decisions

- Secure storage, separate from the main learner file
- Timely transfer of records to receiving schools (within 5 days)

The school will:

- keep clear detailed written records of concerns about children (incl. date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately.
- keep records in a meticulous chronological order, either on paper or electronically.
- ensure all records are kept secure and in locked locations.
- ensure all safeguarding records are transferred - separately from the child's main learner file – to the receiving school, college or other education establishment when a learner moves. The DSL will do this as soon as possible, ensuring secure transit, and will ensure that confirmation of receipt of the records is obtained.
- the DSL will also consider whether it is appropriate to share any information with a learner's receiving school/setting in advance of the learner leaving so that the receiving school/setting is able to support the child as effectively as possible and plan for their arrival.
- ensure that incoming safeguarding records are brought to the attention of the DSL, Deputy DSLs and other relevant key staff when a child transfers in from another school/setting.

Records are maintained via **CPOMS** independently of the learners' school file, with access restricted to DSLs and senior leaders. Records include factual observations, the child's own words where possible, and professional actions taken.

Child protection records form a part of a learner's learner record. Parents/carers would ordinarily have a right to see this information. Any learner or parent/carer may submit a request written request to see these records to the school for consideration.

Although some access to the record may then be arranged, records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the learner, or any other person, at risk of significant harm.

The data protection laws do not prevent school staff from sharing information with relevant agencies without the consent of parents/carers, where that information may help to protect a learner.

When children transfer school, their safeguarding records should also be transferred **within 5 days** of them starting.

Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving school (or 6th form/FE college), with any necessary discussion or explanation and to obtain a signed and dated record of the transfer.

Where a child needs specific on-going support, relevant information will be transferred prior to the child arriving at their new school.

In the event of a child moving out of area and a physical handover not being possible, then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead, and a photocopy of the records kept until receipt is confirmed.

Once confirmation of receipt has been obtained, the photocopied record will be securely disposed of. Files requested by other agencies, e.g. Police should also be copied and stored securely.

22. Confidentiality and Information Sharing

Waterside School follows **Information Sharing Advice for Practitioners (HMG 2024)** and recognises that **effective safeguarding relies on timely and proportionate information sharing**.

- Information is shared on a **need-to-know basis**
- Consent is sought where appropriate but is **not required** if doing so would place a child at risk
- Decisions to share or not share information are clearly recorded
- Staff are trained never to promise confidentiality to learners

The school work closely with **Coventry City Council Children's Social Care**, the Police, and health partners.

22.1 Sharing information with parents

The school will ensure the Safeguarding and Child Protection Policy is available publicly on the school's website. Where appropriate, staff will discuss any concerns about a child with the child's parents/carers. The DSL/DDSL will normally do this in the event of a concern, suspicion or disclosure.

In exceptional circumstances, other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

At Waterside School SEND, safeguarding and child protection information is treated with the utmost importance, recognising that the **data protection laws explicitly allow sharing sensitive information for safeguarding purposes**, even without consent. Staff are made aware that **fears about sharing information must never prevent action to protect a child**, and they must not assume that someone else will share information critical to a child's safety. Where it is necessary to share information without consent, staff record the decision, including who the information is shared with and the rationale for doing so. All sharing of safeguarding information is carried out in a timely, proportionate, and secure manner, with appropriate organisational and technical safeguards in place.

All staff understand that they **must never promise a child confidentiality** regarding allegations or disclosures, as this may not be in the child's best interests. Staff are trained to share information **only within appropriate professional contexts** and on a **'need-to-know' basis**, recognising that safeguarding matters require a **high level of confidentiality** to protect the child, their family, staff, and any ongoing investigations or evidence. Information relating to child protection is stored securely, both physically and electronically, with access restricted to authorised staff only. Portable devices or media used to store sensitive information are encrypted or password-protected and kept in secure storage.

Safeguarding concerns must be reported immediately to the **DSL or Headteacher**. In exceptional circumstances where neither the DSL nor a deputy is available, staff are trained to **contact another member of the senior leadership team (SLT) or seek advice directly from Children's Social Care** without delay. While staff may discuss day-to-day concerns about learners with colleagues to meet general welfare needs, this **does not replace formal reporting of safeguarding concerns**. The DSL ensures that any referrals or actions are disseminated on a **need-to-know basis** to maintain appropriate confidentiality.

When a learner leaves the school, the DSL is responsible for ensuring that the child protection file is **transferred securely to the receiving school or college** within five days for in-year transfers or within the first five days of a new term. Confirmation of receipt is obtained, and files are transferred separately from the main learner file. Key staff at the receiving school, including the **DSL and Special Educational Needs Coordinator (SENCO)**, are informed as required to ensure ongoing support for vulnerable children. Where appropriate, the DSL may share relevant information in advance to ensure support is in place for children who have experienced abuse, have a social worker, or are receiving support through the **Channel programme**.

The DSL will normally **seek consent from the learner and/or parents** before sharing sensitive information. In cases where consent is not obtained, the rationale for this decision is recorded in the safeguarding file. Any requests from learners or parents to access safeguarding records are referred to the **DSL and Data Protection Officer**. Staff understand that safeguarding information should only be shared when it is necessary, proportionate, accurate, and relevant, and that **all decisions regarding sharing must be documented**.

Safeguarding records are maintained securely in line with statutory guidance. Physical files are kept in locked storage, electronic files are password-protected, and access is strictly limited to authorised staff. Any portable media or devices storing sensitive information are encrypted or password-protected and securely stored. Staff are trained to ensure that all safeguarding information is processed in accordance with the DPA 2018, ensuring that personal data is used for **limited purposes, is adequate and relevant, kept no longer than necessary, accurate, and secure**.

Finally, the school maintains transparency and accountability by making its **confidentiality and information-sharing policy** available to parents and learners on request. This ensures that all stakeholders are aware of how safeguarding information is handled, providing confidence that the school protects learners effectively while adhering to legal and statutory requirements.

23. Extended School and Off-Site Arrangements

At Waterside School all **extended and off-site activities** are carefully planned and subject to a **comprehensive risk assessment** to ensure that both health and safety and safeguarding requirements are fully met. This includes **day trips, residential visits, work-related activities, and any other activities outside the school premises**. Risk assessments consider potential hazards, the specific needs of learners, and the safeguards required to protect children, ensuring that staff can take proactive measures to prevent harm.

When learners participate in off-site activities, the school ensures that **effective child protection and whistleblowing arrangements** are in place. This guarantees that any safeguarding concerns arising during off-site activities can be reported and addressed in line with statutory guidance and school procedures. Staff are made aware of their roles and responsibilities during these activities, and the welfare of learners always remains the highest priority.

For **extended school activities provided and managed directly by the school**, the **Safeguarding and Child Protection policy** applies in full, ensuring consistent procedures for reporting, responding to, and recording any concerns. Where activities or services are delivered on the school site by **external organisations**, the school undertakes due diligence to verify that these providers have **appropriate safeguarding policies, child protection procedures, and safer recruitment practices** in place. This ensures that all learners are protected, and that staff, volunteers, and external providers are accountable for maintaining a safe and secure environment.

Overall, the school's approach to extended and off-site activities demonstrates a **robust, risk-aware, and safeguarding-focused culture**, aligning with both **Ofsted inspection expectations and the Independent School Standards (ISS)**, while promoting learner safety, wellbeing, and inclusion in all aspects of school life.

24. Photography and Images

At Waterside School SEND, we recognise that most photographs or videos of learners are taken for innocent, understandable, and acceptable purposes. However, we are also mindful that some individuals may misuse images to harm learners. To safeguard our learners, the school implements **robust measures around the taking, use, and storage of images**. Consent is sought from both learners and their parents/carers before any images are taken, and learners are encouraged to speak to staff if they are concerned about any photographs or videos of themselves. Staff ensure that learners are appropriately dressed in all images to protect their dignity and wellbeing.

When images are used for **publicity purposes**, such as the school website, newsletters, or local publications, careful steps are taken to protect learner identities. Where possible, learners are not named. If naming is necessary, initials are used instead of full names, and images are not paired with identifying details. Decisions

about where, how long, and by whom images may be retained are made carefully, and all images are stored securely, accessible only to authorised staff.

For **protection of both learners and staff**, only school-owned equipment may be used to capture and store images, whether on school premises or during off-site activities, including residential visits. Parents/carers are not permitted to take photographs or video recordings of their own or other learners while on school grounds. For school events such as sports days, concerts, or performances, school staff take group or individual photographs where consent has been given and share them securely with parents/carers through controlled channels such as email or Class Dojo. Group images are only shared once all necessary consent has been obtained.

Visiting professionals working directly with learners must follow the same rules as staff and volunteers in relation to photographing or recording learners. Some professionals may record images solely for professional purposes, such as supporting learner-specific advice or interventions. Contractors carrying out maintenance, building work, or health and safety inspections are **not permitted to take images of learners, staff, or visitors**. If photographs of the premises are required for professional reasons, these must be taken outside of learner hours to ensure the safety and privacy of **learners**.

Overall, Waterside School ensures a **safeguarding-focused, risk-aware approach** to photography and videography, these procedures protect learners' wellbeing, uphold confidentiality, and ensure that all images are used safely, responsibly, and in line with statutory safeguarding guidance.

25. Online Safety

Online safety is recognised as a **core component of safeguarding** at the school, requiring a coordinated, whole-school approach that is embedded across all aspects of teaching, pastoral care, and leadership. It involves collaboration between the **DSL (who also acts as Online Safety Lead), senior leaders, curriculum leads, IT staff, and teaching staff**, ensuring that all learners are educated and protected in the online environment. The school complies with the **DfE's Filtering and Monitoring and Digital Technology Standards**, alongside statutory guidance including *Keeping Children Safe in Education (KCSiE) 2026*, *Teaching Online Safety in Schools (2019)*, and statutory RSHE guidance. Policies including the **Online Safety Policy** and associated **Acceptable Use Policies (AUPs)** set out clear expectations for the safe, responsible, and ethical use of technology by learners, staff, and visitors.

The school recognises that **technology evolves rapidly**, and that new platforms, social media trends, and digital risks may emerge quickly. To address this, the school undertakes an **annual review of online safety provision**, led by the DSL in consultation with senior leaders and curriculum leads, to ensure that policies, procedures, and practices remain current, effective, and responsive to emerging risks. The online safety curriculum is designed to be **inclusive and accessible**, taking account of the heightened vulnerabilities of some learners, including those with special educational needs, disabilities, or those in vulnerable circumstances.

To support a robust online safety culture, the school utilises a range of **nationally recognised resources and guidance**, including DfE advice on teaching online safety, UKCIS resources such as *Education for a Connected World*, guidance on *Sharing nudes and semi-nudes*, and advice for external visitors delivering online safety sessions. The school also incorporates materials from the *National Crime Agency CEOP Thinkuknow* programme, Public Health England's *Every Mind Matters*, and guidance on online challenges, hoaxes, and harmful content. Staff use these resources to educate learners about **digital risks, online resilience, and safe behaviours**, and to support proactive conversations with learners about their online activity.

The school maintains **appropriate Barracuda filtering and monitoring systems** on all school-owned devices and networks, aligned with cyber security standards, to safeguard learners from exposure to harmful or illegal content. These systems aim to protect against risks associated with **content, contact, conduct, and commerce**. Risks include exposure to inappropriate or extremist content, harmful interactions online, misuse of personal data, cyberbullying, sexting, and financial exploitation. Learners are prohibited from accessing chatrooms, social networking sites, and other high-risk platforms on school devices, and mobile phones are banned from school buildings to minimise unsupervised access to digital content. Parents are actively engaged in online safety, with guidance provided to help manage risks at home, including recommended parental controls and supervision of children's online activity.

All staff receive **regular online safety training** and are expected to maintain vigilance in recognising and reporting concerns, both in school and in online contexts, using the same reporting procedures as for offline safeguarding issues. The DSL coordinates responses to online safety concerns, ensuring that incidents are investigated, recorded, and, where appropriate, escalated to external agencies, including the Local Authority, Police, or the LADO. Incidents such as **online bullying or youth-produced sexual imagery (sexting)** are treated as seriously as offline bullying, with consequences managed through the school's anti-bullying policy and safeguarding procedures.

For **remote and online learning**, staff are required to follow safeguarding, staff behaviour (code of conduct), and ICT policies, ensuring that all lessons are delivered via **school-owned devices and accounts** with appropriate monitoring and filtering in place. When providing one-to-one teaching or communicating with vulnerable learners remotely, written parental consent is obtained, including permission to record sessions. Staff are trained to maintain professional conduct, appropriate dress, and a safe setting, and to remain alert to signs of learner distress or vulnerability. Lessons are timetabled and recorded where appropriate, with headteachers or the DSL able to monitor live sessions to safeguard learners and staff.

Staff are required to take **immediate action** if they encounter breaches of online safety, including inappropriate learner behaviour, unsafe settings, or unconsented recording. Any incidents are reported to the DSL, who will manage the matter in line with safeguarding procedures. In exceptional cases where urgent communication is required and a personal device must be used, staff must consult senior leaders, use caller withholding, and safeguard personal data. Staff are also provided with guidance on personal online conduct, social networking, and electronic communication with

learners, as set out in the staff code of conduct. Breaches of online safety rules by staff may result in **referral to the LADO and/or disciplinary action**, reflecting the school's commitment to maintaining a professional, safe, and secure digital environment.

As part of this process, the proprietor will ensure their school has appropriate filtering and monitoring systems in place and ensure that a review of their effectiveness is carried out at least once every academic year. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

Through this comprehensive approach, the school ensures that **learners are both protected and educated** in their online activities, staff are equipped to respond to digital risks, and parents are supported in safeguarding their children outside school. The school embeds online safety within its culture of safeguarding, ensuring that policies, procedures, and practices

26. Child Protection Procedures

26.1 A trauma-informed approach to recognising abuse

At Waterside School, safeguarding is everyone's responsibility and is embedded within a **whole-school culture of vigilance, care and professional curiosity**. We recognise that our learners, as children and young people with special educational needs and disabilities (SEND), may experience **heightened vulnerability** and may communicate distress, fear or harm in non-verbal, behavioural or indirect ways.
Abuse is a form of maltreatment of a child. It can occur through acts of commission or omission and may involve harm that is physical, emotional, sexual or neglectful. Harm can also include the impact of **witnessing abuse**, including domestic abuse, which is now recognised as a safeguarding issue.

Children can be abused:

- within their family
- within institutional or community settings (including school)
- by adults or by other children
- online, or through technology that facilitates offline abuse

Staff at Waterside School are trained regularly to understand and recognise **both overt and subtle indicators of abuse or exploitation**, with particular attention to how trauma, neurodiversity, disability and mental health needs may affect how learners present or disclose concerns.

26.2 Categories of abuse

In line with **Keeping Children Safe in Education (KCSIE) 2026** and **Working Together to Safeguard Children (2023)**, staff are trained to recognise the four categories of abuse:

26.2.1 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It may also occur when a parent or carer fabricates or deliberately induces illness in a child (known as **fabricated or induced illness – FII**).

26.2.2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and adverse effects on emotional development.

This may include:

- conveying that a child is worthless or unloved
- criticism, belittling and name-calling
- silencing a child or dismissing their communication attempts
- imposing developmentally inappropriate expectations
- over-protection or preventing independence
- exposure to domestic abuse, incl teenage relationship abuse
- serious bullying, including cyberbullying
- stalking
- financial exploitation

Some level of emotional abuse is involved in all forms of maltreatment, although it may occur alone.

26.2.3 Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening.

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual abuse can be perpetrated by adults or by other children. Child-on-child sexual abuse is a specific safeguarding issue and is addressed in Section 31.

26.2.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, resulting in serious impairment of health or development. This may include failure to:

- provide adequate food, clothing or shelter
- protect a child from harm or danger

- ensure adequate supervision
- provide access to medical care
- respond to emotional needs

Neglect may begin during pregnancy and continue throughout childhood.

26.3 Indicators of Abuse

Staff are aware that indicators of abuse may be **physical, emotional, behavioural or contextual** and that no single indicator should be viewed in isolation. Children (particularly SEND) may mask injuries, minimise experiences or communicate distress through behaviour rather than words.

Indicators may include (but are not limited to):

- unexplained injuries or frequent accidents
- changes in behaviour, mood or presentation
- show signs of pain or discomfort
- be concerned about getting changed for PE or swimming
- look uncared for
- change eating habits
- withdrawal, anxiety or aggression
- fear of physical contact
- regression in skills or independence
- difficulty forming relationships
- self harm
- show signs of not wanting to go home
- challenge authority
- sexualised behaviour or knowledge beyond developmental expectations
- persistent absence or lateness
- unexplained gifts or money

Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Staff **do not investigate** concerns or attempt to determine intent. Their responsibility is to **observe, record and report** concerns promptly to the Designated Safeguarding Lead (DSL).

26.4 Impact of Abuse

Waterside School recognises that abuse and neglect can have a **significant and long-lasting impact** on children's emotional wellbeing, mental health, behaviour, learning and physical health.

A trauma-informed approach underpins our safeguarding practice, recognising that:

- behaviour may be a response to trauma
- recovery is not linear
- trust in adults may be fragile

The school's role is to provide **safety, stability, predictability and trusted relationships**, alongside timely referral to appropriate support services.

26.5 Taking Action – Staff Responsibilities

All staff are expected to maintain an attitude of **"it could happen here"**.
When a concern arises, staff must:

- take immediate action if a child is in danger (call **999**)
- report concerns **immediately** to the DSL or Deputy DSL
- record concerns on **CPOMS on the same day**
- share information on a **need-to-know basis only**
- seek support if emotionally impacted

If the DSL and Deputy DSL are unavailable, concerns must be escalated to a member of the **Senior Leadership Team** or directly to **Coventry City Council Children's Social Care**.

If the CPOMs system is unavailable and cannot be accessed, staff should make written records (including time, date and signature) on paper and handed to the DSL/DDSL as soon as possible.

If you have immediate and urgent concerns you must speak to the DSL/DDSL before completing the written record. Disclosed information from a learner should not be discussed with any member of staff, other than a DSL, DDSL or Headteacher, who may then authorise you to share information on a 'need to know' basis.

26.6 Responding to Disclosures

Waterside School recognises the courage it takes for a child to disclose harm. Staff are trained to respond in a calm, supportive and non-judgemental manner.
Staff will:

- listen without interruption
- reassure the child that they are believed
- avoid investigative questioning
- explain sensitively that information must be shared to keep them safe
- record the disclosure accurately using the child's own words where possible

Staff will not:

- promise confidentiality
- express shock or disbelief
- place blame on the child
- offer physical comfort unless clearly appropriate and consented to

The DSL will determine next steps in line with **KCSIE 2026**, Coventry Safeguarding Children Partnership procedures, and the child's wishes where appropriate.

When a member of staff/volunteer has concerns about a learner's welfare, the school recognises that harm or risk may be present even where there is **no clear or definitive evidence**. Changes in behaviour, emotional presentation, communication, creative work or physical presentation may indicate that a learner is experiencing distress or unmet need. Staff are expected to respond with **professional curiosity, sensitivity and trauma-informed practice**, recognising that such indicators may arise from a wide range of life experiences and not solely from abuse.

Staff are encouraged to create **safe, supportive opportunities for learners to talk**, using open, non-leading questions and allowing learners to share at their own pace. These conversations are framed to reassure learners that they are being listened to and supported, without making assumptions or pressing for detail. All early concerns, however small they may appear, are recorded promptly on the school's safeguarding recording system (CPOMS) to ensure concerns are identified, monitored and reviewed over time. Where concerns persist following an initial conversation, staff must discuss these with the DSL. Concerns that do not meet the threshold for statutory intervention are managed through **Early Help processes**, ensuring proportionate, timely support in line with local safeguarding arrangements.

Where a learner makes a direct disclosure, staff recognise the courage it takes for a learner to speak out and respond in a calm, reassuring and child-centred manner. **Staff make it clear that they cannot keep information secret** where safety is concerned, while reassuring learners that information will only be shared on a **need-to-know basis** with those who can help keep them safe. Learners are supported to understand this through the school's PSHE and personal development curriculum, which teaches the difference between safe and unsafe secrets.

During disclosures, staff follow trauma-informed principles by listening carefully, allowing learners to speak freely, avoiding judgement, and offering reassurance without making promises or asking investigative questions. Staff clarify essential facts only where necessary to support safeguarding action, explain what will happen next, and ensure learners know who will support them. All disclosures are reported verbally to the DSL as soon as possible and recorded on CPOMS accurately and promptly. Where allegations involve a member of staff (including supply staff, trainee teachers, volunteers, and contractors), the appropriate significant or low-level concern procedures are followed in addition to safeguarding recording.

Reports of sexual violence or sexual harassment are managed with particular care and sensitivity. The DSL, who holds oversight of the school's safeguarding context, leads the initial response, ensuring that the wishes and feelings of the learner are central to decision-making wherever possible. Consideration is given to the nature and seriousness of the incident, whether a crime has been committed, the age and developmental stage of those involved, any power imbalance, ongoing risks, and links to wider safeguarding concerns such as harmful sexual behaviour, exploitation or peer-on-peer abuse. The school balances victim-led support with its wider duty to protect other learners and maintain a safe environment.

The school normally seeks to work in partnership with parents/carers when concerns arise, recognising the importance of transparency and collaboration. However, the **safety and wellbeing of the learner remain paramount**. This **must** be handled **sensitively,** and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

Where informing parents/carers may place a learner at increased risk or undermine safeguarding action, the DSL will seek advice from Children's Social Care before making contact. This approach ensures that safeguarding responses are **proportionate, child-centred and focused on reducing risk and promoting welfare**.

27. Referrals to Children's Social Care

The DSL is responsible for making referrals to **Coventry City Council Children's Social Care** where there is reasonable cause to believe a child:

- is a **child in need** (Section 17, Children Act 1989) as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare.
- is suffering or likely to suffer **significant harm** (Section 47 of the Children Act 1989). Local authorities, with the help of other organisations, have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. In addition, children and young people may be at risk of significant harm from outside of their home environment (extra familial harm), this too could constitute that the child may suffer significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare (child protection or MACE) and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

Parents and learners will be informed of referrals unless doing so would increase risk.

28. Making Child Protection Referrals

All child protection referrals are made in line with statutory guidance and local safeguarding arrangements, ensuring timely and appropriate action to protect children. Where concerns meet the threshold for statutory intervention, the Designated Safeguarding Lead (DSL) will submit a referral to Children's Social Care using the designated referral form. This process supports clear information sharing and enables the local authority to assess risk and determine the most appropriate response, in line with the Independent School Standards and Ofsted expectations for effective safeguarding systems.

Where there is an **immediate risk of harm**, referrals are made without delay by telephoning Children's Social Care in the first instance, followed by submission of the referral form as soon as possible. This reflects a culture of vigilance and professional responsibility, ensuring that urgent concerns are acted upon promptly. Outside of normal working hours, urgent safeguarding concerns are referred to the local authority's out-of-hours Children's Social Care service to ensure continuous protection for children.

If a child is already known to Children's Social Care and has an allocated social worker, any further safeguarding concerns are referred directly to that social worker rather than via the general Children's Social Care team. The DSL will normally make initial contact by telephone and will escalate concerns to the social worker's line manager or the wider Children's Social Care team if there are difficulties in making contact or if

responses are delayed. This approach ensures accountability and persistence in securing appropriate safeguarding action.

All staff understand that **anyone can make a referral** if they believe a child is in immediate danger. Where there is an urgent risk to life or safety, staff will contact the Police by dialling 999. Staff may also seek advice or support directly from the relevant local authority safeguarding contact where this is necessary to safeguard a child. These procedures reflect a strong safeguarding culture in which responsibility is shared, action is proportionate, and the welfare of the child always remains paramount.

- **Urgent concerns**: Telephone Coventry Children's Social Care immediately, followed by written referral
- **Out of hours**: Contact the Coventry Emergency Duty Team
- **Open cases**: Contact the allocated social worker directly

The school will follow up referrals and use Coventry escalation procedures if concerns are not adequately addressed.

29. Direct Referrals by Staff

While staff should normally follow internal procedures outlined in the policy, any member of staff may refer concerns directly to Children's Social Care or the Police if:

- a child is in immediate danger and senior staff are unavailable
- they believe this is necessary to protect the child's safety
- for any other reason they make a judgement that a direct referral is in the child's best interest.

Staff will not be penalised with disciplinary action for making a referral in good faith and should inform the DSL and/or headteacher at the earliest opportunity that they have made a direct referral, unless in their judgement doing so would increase the risk of harm to the child. If in any doubt, members of staff may consult or seek support from Children's Social Care and/or a relevant local authority safeguarding contact.

30. Response from Children's Social Care

Children's Social Care should determine the appropriate response within **one working day and** inform the referrer of the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required.
- whether the child is in need and should be assessed under section 17.
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47 (details of the assessment process - Chapter one of Working Together to Safeguard Children).
- any services are required by the child and family and what type of services.
- further specialist assessments are required to help the local authority to decide what further action to take.

The school will follow up if this information is not forthcoming and if, after a referral, the child's situation does not appear to be improving, the school will consider following

the Local Authority escalation protocol to ensure the referred concerns have been addressed and, most importantly, that the child's situation improves.
If Children's Social Care decide to carry out a statutory assessment, Waterside School will cooperate fully with assessments and contribute to plans to safeguard and promote the child's welfare, led and supported by the DSL (or deputy) as required.

31. Bullying, Child-on-Child Abuse and Harmful Sexual Behaviour

Waterside School maintains a **zero-tolerance approach** to all forms of bullying and child-on-child abuse. Abuse is never minimised or dismissed as "banter" or "part of growing up". We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other learners in the school. Part 5 of KCSiE 2026 sees the integration of guidance on sexual violence and sexual harassment.

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies **to behaviour occurring online, face-to-face, or both.**

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. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

Advice on responding to children who display sexualised behaviour is available in Responding to children who display sexualised behaviour.

Children may be harmed by other children or young people. All staff recognise that children can abuse other children and are trained to understand and implement the school's policy and procedures regarding child-on-child abuse.
All child-on-child abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:

- bullying, incl. online bullying prejudice-based and discriminatory bullying.
- abuse in intimate personal relationships between peers (sometimes known
- as 'teenage relationship abuse'.)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. This may include an online element which facilitates, threatens and/or encourages physical abuse.
- serious physical assault and harm, or the threat of harm with a weapon.
- sexual violence, such as rape, assault by penetration and sexual assault. This may include an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment, such as sexual comments, jokes and online sexual harassment, can be stand-alone 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 taking and sharing of nudes and semi-nude images and or videos. Also known as sexting or youth produced sexual imagery (UKCIS Guidance).
- "upskirting", which 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 to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence and may constitute sexual harassment. Anyone of any gender can be a victim.
- teenage relationship abuse – defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner.
- initiation/hazing. 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. For example, can be used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them.
- prejudiced behaviour. A range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

All incidents are managed through safeguarding procedures, behaviour policy and anti-bullying policy, with **SEND-informed, proportionate responses** that prioritise the safety of victims while addressing the needs and risks of those who cause harm.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

At Waterside School, we recognise that bullying and child-on-child abuse can have a **profound and lasting impact** on a child or young person's emotional wellbeing, sense of safety, ability to learn and capacity to form trusting relationships. For learners with special educational needs and disabilities (SEND), the impact may be **heightened**, and the ability to recognise, articulate or report harm may be reduced.

We therefore adopt a **trauma-informed, SEND-responsive and zero-tolerance approach** to bullying and child-on-child abuse in all its forms. Any behaviour that causes harm, fear, humiliation or distress to another child is taken seriously and responded to promptly, proportionately and consistently.

All incidents of bullying are reported, recorded and managed in line with the school's **Behaviour Policy** and **Anti-Bullying Policy**, which are available via the school website and shared drive. Learners and parents/carers are informed of these procedures on admission to the school.

Bullying is addressed proactively through:

- a **planned PSHE and Relationships and Sex Education (RSE) curriculum**, adapted appropriately for SEND

- a strong emphasis on **respect, empathy, consent, emotional literacy and healthy relationships**
- clear behaviour expectations and consistent adult responses

All staff receive training as part of induction and ongoing professional development to recognise the **harm caused by bullying and child-on-child abuse**, including the ways these may present differently in children with SEND.
Abuse is abuse. It will **never be tolerated, minimised or dismissed** as:

- "banter"
- "just having a laugh"
- "part of growing up"
- "boys being boys" or "girls being girls"

31.1 Child-on-Child Abuse: Safeguarding Context

Staff are trained to understand that:

- abuse can occur between children of any gender
- both girls and boys can be victims and perpetrators
- SEND learners may be particularly vulnerable due to communication needs, social understanding, dependency on others, or previous trauma
- children who cause harm may themselves be victims of abuse, exploitation or unmet needs

All allegations or concerns of a safeguarding nature are **recorded on CPOMS** and reported **immediately** to the Designated Safeguarding Lead (DSL) or a Deputy DSL.

31.2 Minimising the risk of sexual violence and sexual harassment at the school through a mandatory planned curriculum

The school adopts a proactive and preventative approach to safeguarding by minimising the risk of sexual violence and sexual harassment through a mandatory, carefully planned and sequenced curriculum. In line with the Education Inspection Framework and the Independent School Standards, the school recognises its responsibility to deliver statutory Relationships Education, Relationships and Sex Education (RSE), Health Education, PSHE and citizenship programmes, alongside the behaviour policy, pastoral support systems and staff behaviour (code of conduct) policy. The curriculum is adapted appropriately for the age, developmental stage and needs of pupils, including those with SEND, and reflects the principle that children of all ages need to learn about respect, consent, body autonomy, boundaries and healthy relationships.

Teaching explicitly addresses the fact that children can harm other children and supports pupils to recognise unacceptable behaviour, understand the impact of their actions and know how to seek help. Content is inclusive, accessible and trauma-informed, taking account of pupils' vulnerabilities and prior experiences. Through this planned curriculum, pupils are supported to develop the knowledge, skills and confidence needed to keep themselves and others safe, contributing to a strong safeguarding culture and positive behaviour across the school.

31.3 How the school will respond to reports of sexual violence and sexual harassment

The school will respond to all reports of sexual violence and sexual harassment in accordance with Part 5 of *Keeping Children Safe in Education (KCSIE) 2026*. The school recognises that every situation is unique and therefore applies a clear set of safeguarding principles to guide responses on a case-by-case basis. All reports are taken seriously, regardless of when the disclosure is made, and will be handled sensitively, promptly and proportionately.

The DSL or DDSL, will lead the school's initial response, drawing on their wider safeguarding overview and professional judgement. Victims will be reassured that they are being believed, supported and kept safe. Abuse that has taken place online or outside the school will be treated with the same seriousness as abuse occurring on site. Pupils will never be made to feel that they are causing a problem by reporting concerns, nor will they be blamed or shamed. The school will explain the role of the law in a way that protects children and avoids unnecessary distress or alarm.

31.4 Risk assessment

Following any report of sexual violence or sexual harassment, the DSL (or deputy) will carry out an immediate risk and needs assessment. This assessment will be informed by professional judgement and, where appropriate, advice from Children's Social Care, the Police and local authority safeguarding contacts. The assessment will consider the protection and support needs of the victim, any risks posed by the alleged perpetrator(s) where they attend the same school, and the potential impact on other pupils, staff and the wider school community.

Where sexual violence is reported, it is likely that specialist or statutory risk assessments undertaken by social workers or sexual violence professionals will be required. The school's own assessment will not replace these expert assessments but will be informed by them and used to guide day-to-day safeguarding arrangements, support plans and risk management strategies within the school.

31.5 Action following a report of sexual violence and/or sexual harassment – what to consider

In determining the most appropriate response, the DSL (or deputy) will consider a range of factors. Central to this will be the wishes of the victim, particularly regarding how they want the matter to proceed, while balancing this with the school's duty to safeguard the victim and protect other children. Consideration will be given to the nature and seriousness of the alleged incident, including whether a criminal offence may have occurred and whether the behaviour constitutes harmful sexual behaviour.

The ages and developmental stages of the children involved will be carefully considered, as will any power imbalance, such as differences in age, maturity, confidence or additional vulnerabilities including SEND. The DSL will consider whether the incident is isolated or part of a sustained pattern of abuse and will recognise that sexual violence and harassment can occur within peer or intimate relationships. Wider contextual factors, including links to child sexual exploitation or criminal exploitation, will also inform decision-making. Information will be shared strictly on a need-to-know

basis, and parents or carers will usually be informed unless doing so would place the child at greater risk of harm.

31.6 Children sharing a classroom/teaching area: initial considerations following a report of sexual violence

Any report of sexual violence is likely to be highly distressing for the victim, particularly where allegations involve rape or assault by penetration. While the school establishes the facts and liaises with Children's Social Care and the Police, immediate consideration will be given to separating the victim and alleged perpetrator(s) in lessons, shared spaces and, where relevant, transport arrangements. These measures are taken to safeguard all children and should not be viewed as a judgement on the guilt of the alleged perpetrator(s).

For other reports of sexual violence or sexual harassment, the school will still carefully consider proximity, shared classes and access to shared spaces. Decisions will reflect the wishes of the victim, the nature of the allegations and the need to protect all pupils, in line with KCSIE 2026. The school will also consider whether the alleged perpetrator may themselves be a victim of exploitation, coercion or control.

31.7 Responding to the report

Where a criminal offence may have been committed, the Police will be informed, usually alongside a referral to Children's Social Care. While parents and victims may choose to make reports directly, the school recognises its own duty to ensure appropriate agencies are informed to safeguard other children. Where significant harm is identified, Children's Social Care will be involved to ensure statutory assessment and coordinated multi-agency support for both the victim and, where appropriate, the alleged perpetrator(s).

The school will not delay protective action while awaiting the outcome of external investigations. The DSL will work closely with statutory agencies to ensure that school-based actions support, rather than compromise, any investigation, and that safeguarding arrangements are reviewed and updated as needed.

31.8 Possible responses

The school recognises four broad responses to incidents of sexual violence or sexual harassment. In some cases of lower-level sexual harassment, the matter may be managed internally through the behaviour policy, anti-bullying procedures and pastoral support, with clear expectations set and recorded. In other cases, Early Help may be appropriate to address emerging concerns, particularly non-violent harmful sexual behaviour, and to prevent escalation.

Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral will be made to Children's Social Care. All sexual activity between pupils on the school site, and all incidents involving children under the age of ten, will be referred. Reports of serious sexual offences will normally be referred to the Police, alongside Children's Social Care, to ensure a coordinated safeguarding response.

31.9 Subsequent considerations

As cases progress, the needs and wishes of the victim will remain paramount. Wherever possible, the school will support the victim to maintain normal routines so that school remains a safe and supportive environment. Alleged perpetrators also retain the right to education, subject to ongoing risk assessment, appropriate safeguards and any statutory conditions such as bail requirements.

Where convictions, cautions or other outcomes arise, the school will update risk assessments, implement appropriate sanctions in line with the behaviour policy and ensure continued support for all pupils involved. The school will also take steps to manage the wider impact on the school community, including preventing bullying, harassment or online speculation.

31.10 Youth produced sexual imagery ('sexting')

All incidents of youth produced sexual imagery (YPSI) are treated as safeguarding concerns and managed in line with DfE and UK Council for Internet Safety (UKCIS) guidance. The primary concern is always the welfare and protection of the young people involved, while avoiding unnecessary criminalisation. Staff must report all concerns immediately to the DSL and must not view, copy, store, print or delete images.

Where devices are involved, they will be secured and passed to the DSL, who will determine next steps and consult with Children's Social Care and/or the Police as appropriate. Aggravated incidents involving coercion, exploitation, power imbalance, threats or malicious intent will normally result in multi-agency involvement and may require specialist support and statutory intervention.

31.11 Viewing the imagery

The school applies strict safeguards in relation to the viewing of youth produced sexual imagery. Imagery will only be viewed where necessary to inform safeguarding decisions, following consultation with senior leaders or external agencies. Viewing will be undertaken only by the DSL, headteacher or appropriately authorised senior staff, with another member of staff present, and will be fully recorded in the pupil's safeguarding file. Decisions to view imagery will always be based on professional judgement and the best interests of the child.

31.12 Deletion of images

Where it is agreed that statutory agencies do not need to be involved, the DSL will carefully manage the deletion of imagery from devices and online platforms to reduce the risk of further sharing. This process will be undertaken in partnership with parents and, where appropriate, external agencies, and will be clearly documented within safeguarding records.

31.13 Key points for staff and volunteers

All staff and volunteers are clear that any concerns relating to sexual violence, sexual harassment or youth produced sexual imagery must:

- Be reported immediately to the DSL.
- Staff must not investigate, view or share imagery.
- Must not promise confidentiality.

- Must avoid any actions that could cause further harm.

Pupils should be reassured that reporting concerns is the right thing to do and that they will receive appropriate support. This shared understanding ensures consistent, lawful and compassionate safeguarding practice across the school.

32 Serious Violence

All staff receive safeguarding training that enables them to recognise and respond appropriately to indicators that a child may be at risk from, or involved in, serious violent crime, including criminal exploitation and gang-related activity. This reflects the school's commitment to maintaining a strong safeguarding culture. Staff understand that concerns relating to serious violence are safeguarding concerns and must be acted upon promptly, using the same recording and reporting procedures as for any other child protection issue.

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead 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.

Staff are trained to remain professionally curious and alert to a range of potential indicators. These may include increased or unexplained absence or persistent lateness; changes in behaviour, presentation or emotional wellbeing; a sudden decline in academic performance or engagement; withdrawal from previously positive peer relationships; or the development of new associations, particularly with older individuals or groups. Other indicators may include signs of self-harm, increased anxiety, low mood or trauma-related behaviours, as well as physical signs such as unexplained injuries or evidence of assault.

Staff are also made aware that children who are being groomed or exploited may receive unexplained gifts, money or new possessions, which may indicate involvement with individuals linked to serious violence, criminal gangs or wider forms of criminal exploitation. All such concerns, whether arising from a single incident or a pattern of low-level observations over time, must be recorded accurately and shared without delay with the DSL.

The DSL will consider the information in the context of the wider safeguarding picture, determine the level of risk, and take appropriate action, including consultation with external agencies where necessary, to safeguard the child and reduce the risk of harm.

33. Contextual Safeguarding

Waterside School recognises that safeguarding risks do not exist solely within the home or school environment. **Contextual (extra-familial) safeguarding** considers the wider environments in which children live, socialise and interact, including online spaces. Extra-familial (also known as contextual safeguarding) harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse, harassment, exploitation, domestic abuse in their own intimate relationships, criminal exploitation, serious violence, county lines, and radicalisation.

Safeguarding incidents and/or behaviours can be dependent on factors both outside children's home environments and outside school often between children outside the school.

The DSL and staff consider the context in which these incidents or behaviours occur. Contextual safeguarding recognises that risks to children's safety and wellbeing may arise from the wider environments in which they live, learn and socialise, not solely from within the family home. In line with Ofsted expectations and the Independent School Standards, the school ensures that safeguarding assessments and responses take account of contextual factors such as peer relationships, community influences, online spaces, neighbourhood risks and extra-familial harm.

Staff are trained to listen carefully to children, to exercise professional curiosity, and to remain alert to signs and indicators that may suggest a child is experiencing risk or harm in the wider community. Where concerns are identified, these are treated as safeguarding matters and are recorded and shared promptly with the Designated Safeguarding Lead (DSL). Waterside School work proactively with partner agencies and, where appropriate, shares relevant information and intelligence with the Police and Children's Social Care to support early intervention, disruption of risk and the prevention of harm.

When contributing to police enquiries, strategy discussions or referrals to Children's Social Care, the school will provide clear, timely and proportionate information. This enables multi-agency partners to build a full and accurate understanding of the child's circumstances and the wider context of any concerns, ensuring that assessments, investigations and protective actions are informed by all available evidence and focused on promoting the child's safety and welfare.

34 Sexual Violence and Sexual Harassment Between Children

Child sexual exploitation (CSE) is a form of child sexual abuse.
Child criminal exploitation (CCE) is a form of child abuse.

Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

a) in exchange for something the victim needs or wants; and/or
b) for the financial advantage/increased status of the perpetrator(s)

c) through violence or the threat of violence (This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance.)
d) grooming behaviour
e) This can be committed or facilitated by an organised network or. gang, and the victim may identify as being part of this group.

Victims could have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur using technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16- and 17-year-olds who can legally give consent to have sex.

Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media). CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.

It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Sexual violence and sexual harassment can occur between children of any age, gender or developmental stage, including children with SEND. These behaviours exist on a **continuum**, may overlap, and may occur online or face-to-face. They are **never acceptable**.

Criminal exploitation of children can involve enticement-based and/or force methods of compliance, often accompanied by violence or threats thereof. It can be perpetrated by individuals or groups, including those of any gender or age. Typically, with a form of power imbalance in favour of those perpetrating the exploitation. This power imbalance can result from age, gender, cognitive ability, physical strength, status and access to economic or other resources.

Children/young people are often unintentionally drawn into CSE and/or CCE through grooming that begins with an offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- travelling outside the area in which they live to transport, distribute or sell drugs or money for others. This form of criminal activity and exploitation is referred to as county lines (see below).
- committing crimes on behalf of others because they, their friends or relatives have been threatened, deceived or manipulated.
- being forced to shoplift or pickpocket.

- being forced to threaten other young people.
- being forced to work in a cannabis factory.
- being forced or manipulated into committing vehicle crime or threatening/committing serious violence.
- being threatened (and their families) with violence or entrap and coerce them into debt.
- being coerced into carrying weapons or begin to carry a knife for protection.
- being forced to commit crime to settle actual or fabricated debts.
- gang membership, leading to being exploited to do something illegal or dangerous in return for status in the gang.
- being encouraged or manipulated to commit crime via social media.
- receiving food, money, or status in return for storing a weapon or drugs for others.
- it is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of CCE too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

- appearing with money, clothes, mobile phones, etc. without credible explanation.
- associations with other young people involved in exploitation.
- relationships with controlling or significantly older individuals or groups.
- frequenting areas known for sex work and/or criminal activity.
- associations with gangs and/or become isolated from their social networks.
- receiving excessive texts/phone calls.
- multiple callers (unknown adults or peers).
- concerning use of internet or other social media.
- increasing secretiveness around behaviours.
- presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant.
- self-harming or presenting with significant changes in their emotional well-being.
- misusing drugs and alcohol.
- go missing for periods of time or regularly come home late.
- regularly miss school or education, have unexplained absences or do not take part in education.
- being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into violence towards others by somebody who is exploiting them.
- evidence of/suspicions of suffering physical or sexual assault.

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

- having a prior experience of neglect, physical and/or sexual abuse.

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

The school teaches children about consent and the risks of sexual and criminal exploitation in the PSHE and RSE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Social Care (see sections 27 and 28 above) as with any other child protection concern and with reference to local safeguarding procedures. Parents will be consulted and notified as above.

Following a referral to Children's Social Care, a Multi-Agency Child Exploitation (MACE) meeting may be convened under the local Safeguarding Children Partnership inter-agency safeguarding procedures. The school will attend and share information at MACE meetings as required. Parents and young people will be invited to attend MACE meetings by Children's Social Care as appropriate.

In line with **KCSIE 2026**, all staff maintain an attitude of **"it could happen here"**.

34.1 County Lines

County lines is a recognised form of serious and organised crime and child criminal exploitation, which is addressed within statutory safeguarding guidance and the Independent School Standards. It describes the activity of criminal gangs and organised networks who transport and distribute illegal drugs, most commonly crack cocaine and heroin, across different areas of the UK. These networks typically operate through dedicated mobile phone "deal lines" and rely on children and vulnerable adults to facilitate the movement, storage and sale of drugs and associated money.

Exploitation is central to the county lines model. Children may be targeted because of their age, vulnerability or unmet needs and are groomed into criminal activity through

a range of abusive tactics. These can include coercion, intimidation, threats, physical violence, sexual violence and the use of weapons. Children may be instructed to carry drugs or money, store drugs in their homes or on their person, or travel to unfamiliar areas, often placing them at significant risk of harm.

Children involved in county lines are victims of abuse and exploitation and may become trapped within these networks. Criminal groups frequently create artificial drug debts and use threats of serious violence, abduction or harm to the child or their family to maintain control and prevent disengagement. In these circumstances, children may be victims of modern slavery. The school recognises county lines as a safeguarding issue, not a behavioural or disciplinary matter, and ensures that concerns are identified early, recorded appropriately and referred to the Designated Safeguarding Lead. We work in partnership with external agencies, including Children's Social Care and the Police, to protect children, disrupt criminal exploitation and promote their safety and welfare.

35 So called "Honour Based' Abuse

So-called honour-based abuse (HBA) is a form of child abuse and violence that is committed to protect or defend the perceived honour of a family and/or community. It can encompass a range of abusive practices, including Female Genital Mutilation (FGM), forced marriage and other harmful practices such as breast ironing. These forms of abuse are often characterised by significant family and community involvement, with pressure exerted by multiple individuals, and may involve more than one perpetrator.

The school recognises that abuse linked to so-called honour is particularly complex and may present heightened risks to children due to the potential for secrecy, collusion and extended family or community influence. Staff are therefore trained to be alert to indicators that a child may be at risk of, or has already experienced, honour-based abuse and to understand that such abuse may escalate rapidly if concerns are not managed appropriately.

All forms of so-called honour-based abuse are recognised as abuse, regardless of motivation or cultural context. Any concerns will be recorded promptly and reported to the DSL in accordance with the school's safeguarding procedures. The DSL will assess the level of risk and consider the need for immediate protective action, including referrals to Children's Social Care and/or the Police, as with any other child protection concern.

Where appropriate, the DSL may also seek specialist advice, including from the Forced Marriage Unit, to support decision-making and ensure that safeguarding responses are proportionate, timely and effective. Waterside School work in accordance with multi-agency statutory guidance on forced marriage and other forms of honour-based abuse, and is committed to working collaboratively with external agencies to protect children, uphold their rights and promote their safety and welfare.

Useful Contacts for support:
Forced Marriage Unit on 020 7008 0151

via email at fmu@fco.gov.uk

Multi-agency statutory guidance for dealing with forced marriage can be found at The right to choose government guidance on forced marriage www.gov.uk

35.1 Female genital mutilation (FGM)

FGM is a recognised form of child abuse and violence against girls and young women. It refers collectively to procedures that involve the partial or total removal of external female genitalia, or other injury to the female genital organs, for non-medical purposes. FGM has no health benefits and can result in significant short- and long-term harm, including extreme pain, psychological trauma, urinary or menstrual difficulties, and complications in childbirth.

FGM may be carried out on girls of any age, from infants to teenagers, and school staff are trained to recognise indicators that a child may be at risk. Particular attention is given to female pupils who may be travelling abroad for extended periods, for example during school holidays. In England, Wales, and Northern Ireland, FGM is illegal under the **Female Genital Mutilation Act 2003**, with offenders liable to a maximum of 14 years' imprisonment, a fine, or both. Guidance for schools and professionals is available here: FGM Guidelines.

Staff who suspect or identify that a girl may be at risk of FGM must follow the school's safeguarding procedures, recording concerns and reporting them immediately to the Designated Safeguarding Lead (DSL). The DSL will consider the need for a referral to **Children's Social Care** and will involve the **Police** where appropriate.

Indicators that FGM may have already occurred include:

- Difficulty or discomfort when walking, sitting, or standing
- Extended time spent in the bathroom due to urination difficulties
- Frequent absence from class due to bladder, menstrual, or stomach problems
- Noticeable behavioural changes, withdrawal, or depression on returning to school
- Reluctance to undergo routine medical examinations
- Confiding in staff without explicit details due to embarrassment or fear
- Complaints of pain or discomfort in the genital area

Under **Section 5B of the Female Genital Mutilation Act 2003** (as amended by Section 74 of the Serious Crime Act 2015), teachers have a statutory duty to report directly to the Police if they discover that FGM appears to have been carried out on a girl under 18. This is known as mandatory reporting. Guidance on the process is available here: Mandatory Reporting of FGM. Teachers must also record concerns and inform the DSL, who will support them in making a report and ensure that Children's Social Care is notified.

35.2 Forced Marriage

A forced marriage is a marriage in which one or both parties do not freely consent and are coerced into the arrangement through physical, emotional, financial, sexual, or psychological pressure. This may include threats or actual use of violence. Forced

marriage differs from arranged marriage, in which families may facilitate the match but the individuals retain the right to consent.

Children are particularly at risk of forced marriage, including those below the legal age of consent in England, and staff must be alert to pupils expressing concerns about being taken abroad or prevented from returning. Indicators of forced marriage may include:

- Extended absences from school, a drop in academic performance, or low motivation
- Restrictions on personal freedom and excessive parental control
- Evidence of siblings leaving education early to marry
- Worry or anxiety linked to an upcoming family holiday
- Signs of self-harm, depression, or emotional distress
- Evidence of family conflict or disputes
- A child going missing or running away
- Direct disclosures from the child

Children with learning disabilities may be particularly vulnerable and less able to articulate concerns, requiring careful monitoring and support. Staff must **never attempt to intervene directly** or through a third party. Any suspicions must be reported to the **DSL**, who will make a referral to **Children's Social Care** and/or the **Police** for specialist safeguarding action.

Since **June 2014**, forcing someone to marry is a criminal offence in England and Wales under **Section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014**. Guidance for schools and professionals is available here: Forced Marriage Guidance.

36 Protecting Children from Radicalisation and Extremism

All schools and colleges have a statutory duty under **Section 26 of the Counter-Terrorism and Security Act 2015 (CTSA 2015)** to have "due regard to the need to prevent people from being drawn into terrorism." This responsibility is known as the **Prevent Duty**. Protecting children from the risks of radicalisation is an integral part of the school's broader safeguarding obligations and aligns with the school's approach to protecting children from all forms of harm and abuse. The **DSL** overall responsibility for the school's strategy to prevent children from being drawn into extremism or terrorism.

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. **Extremism** is defined as the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance for different faiths and beliefs. This includes advocating for the death of members of the armed forces. Children and young people, even at a very young age, may be exposed to extremist influences at home, in the community, or online.
As children grow, they often explore questions of identity, belonging, and purpose, which can make them more vulnerable to extremist messaging. Extremist groups often use the internet and social media to target young people, offering a sense of

belonging, identity, and adventure. Children who feel isolated, marginalised, or disaffected are at heightened risk, as they may be more susceptible to exploitation in a similar way to other forms of abuse. Radicalisation can be **violent or non-violent**, though most research focuses on pathways to violent extremism.

36.1 Indicators of Radicalisation

Staff are trained to recognise early warning signs that a child may be drawn into extremist ideologies or groups. Examples include:

- Spending increasing amounts of time with individuals suspected of extremist views
- Adopting the dress, symbols, or behaviours associated with an extremist group
- Day-to-day life increasingly centred around extremist ideas
- Withdrawal from friends, activities, or education not related to extremist ideologies
- Possession or distribution of materials promoting extremist views
- Attempts to recruit others to an extremist cause
- Communications (online or in person) showing identification with an extremist group

Indicators that an individual may intend to use violence or illegal means include:

- Identifying other groups as threats and blaming them for societal problems
- Using derogatory or insulting language to describe other groups
- Expressing imminent threats or urgency to act
- Justifying offending on behalf of an extremist ideology
- Supporting or condoning violence towards others
- Planning or conspiring with others to commit acts of harm

Indicators of capability to contribute to terrorism include:

- History of violence or criminal activity
- Access to criminal networks that could support extremist aims
- Relevant occupational or technical skills (e.g., IT, engineering, chemicals, survival skills)

These lists are **not exhaustive**. Vulnerability can present in many ways, and no single profile determines whether a child will be radicalised. Staff are trained to use **professional judgement** and report any concerns, however minor they may seem.

36.2 School Preventative Measures

The school ensures that children are safe from terrorist and extremist content online and in school. Preventative strategies include:

- Promoting core British values: democracy, rule of law, individual liberty, mutual respect, and tolerance
- Providing opportunities within the curriculum to discuss religion, ethnicity, culture, and controversial issues
- Ensuring pupils feel valued, listened to, and included
- Building pupils' resilience and critical thinking skills to challenge extremist narratives

36.3 Staff Training and Reporting

All staff, including volunteers, contractors, and external providers, receive training on:

- Definitions of extremism, radicalisation, and terrorism
- Understanding the risks affecting children and young people
- Identifying children at risk and how to respond appropriately

Staff report all concerns about radicalisation or extremism to the DSL **immediately**, in line with standard safeguarding procedures. Early indicators may include behavioural changes, declining engagement in learning, and expressions of support for extremist ideas or tolerance of violence.

36.4 Referrals and Support

Waterside School work closely with external agencies to safeguard children:

- **Channel Programme**: Provides early support for individuals identified as vulnerable to radicalisation. Engagement is voluntary, and schools may attend panels to contribute to risk assessment and support planning.
- **Police Prevent Team**: Offers guidance and intervention where there are concerns of radicalisation.

The school engages parents and carers in safeguarding discussions unless there is reason to believe this could put a child at risk. Parents raising concerns about radicalisation are supported in accessing appropriate help. Early help interventions may be offered in consultation with the Police Prevent Team.

36.5 Adult Conduct and Extremism

All staff, volunteers, visitors, and external agencies using school premises are expected to adhere to the **Staff Behaviour Policy (Code of Conduct)**. Extremist views or behaviours displayed by adults in the school environment will be challenged, and appropriate referrals made if necessary.

36.6 Resources and Guidance

Staff, parents, and pupils are encouraged to use reliable resources for information and support, such as:

- Educate Against Hate: Guidance for recognising and addressing extremism and radicalisation in young people
- Prevent Duty Guidance

The DSL regularly reviews local intelligence, pupil reports, national trends, and safeguarding learning to update school practices, policies, and procedures to maintain pupil safety and resilience against radicalisation and extremism.

37. Children in Care (CiC), Previously CiC, or with a Social Worker

37.1 Children in Care (CiC)

Children become looked after most commonly due to abuse or neglect. Children currently in care or who were previously in care may remain particularly vulnerable

and require additional pastoral support. Schools should ensure these children have access to any communication or learning support they require. Staff must have the skills and understanding to safeguard children in care and those previously in care. Appropriate staff must be aware of a child's care status and arrangements, including any authority delegated to the carer by the local authority.

The **Designated Teacher for CiC and previously CiC** and the **DSL** hold the contact details of the child's social worker and the Local Authority responsible for CiC.

37.2 Children with a Social Worker

Children with a social worker are considered at greater risk of harm and may face barriers to learning, including attendance, behaviour, and mental health challenges. The school takes these factors into account when planning support and interventions.

37.3 Care Leavers

Local authorities maintain responsibilities for care leavers, including ongoing contact, needs assessment, and appointment of a **Personal Advisor** who develops a pathway plan. The **DSL** maintains contact with the appointed Personal Advisor and liaises as necessary to ensure appropriate support is in place for care leavers in education or training.

38. Private Fostering Arrangements

A **private fostering arrangement** occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative for **28 days or more**. Close relatives include grandparents, siblings, uncles, aunts, step-parents, and half-siblings. Children in local authority care, residential schools, hospitals, or children's homes are not privately fostered.

On admission, the school verifies parental responsibility and the relationship of accompanying adults. Private fostering occurs in all cultures and can start at any age. While many arrangements are safe, privately fostered children are potentially vulnerable and may have been trafficked, abused, or criminally exploited.

Parents and private foster carers **must notify Children's Social Care at least six weeks before the arrangement begins**. Failure to do so is a criminal offence. The school has a **mandatory duty** to notify Children's Social Care if aware or suspect a private fostering arrangement. The **DSL** will confirm with the family that they are aware of this duty and ensure the local authority is informed. School staff should notify the DSL when they become aware of or suspect private fostering arrangements. The DSL lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school will also fulfil its duty to inform the local authority of the private fostering arrangement.

39. Domestic Abuse

39.1 Definition and Scope

Domestic abuse encompasses psychological, physical, sexual, financial, or emotional abuse and may occur as a single incident or as a pattern of behaviour. Children may witness or experience domestic abuse in the home or in their own relationships (teenage relationship abuse), which can have long-term detrimental effects on health, wellbeing, development, and learning.

Domestic Abuse Act 2021 The Act creates a statutory definition of domestic abuse based on the *existing cross-government definition*.

39.2 Domestic Abuse Act 2021

The Act defines domestic abuse as:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional, or other abuse

Both parties must be aged 16 or over and "personally connected," which includes spouses, civil partners, individuals in an intimate personal relationship, and those who share a parental relationship. Children are recognised as victims in their own right.

39.3 School Response

Concerns about domestic abuse are reported to the **DSL** as with any safeguarding concern. The DSL consults **Children's Social Care** to determine whether a referral is required or whether early help and parental support are appropriate.

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

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care 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. Waterside School in partnership with the local Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

39.4 Operation Encompass

The school participates in **Operation Encompass**, ensuring that when the police attend a domestic abuse incident involving a pupil's household, the **Headteacher and DSL** receive a confidential notification the next school day. Staff provide support with care, sensitivity, and discretion. Parents may also be offered support as appropriate.

40. Homelessness

Homelessness or risk of homelessness presents a risk to the child's welfare and is a safeguarding concern. The **DSL** refers concerns to the **Local Housing Authority** to address them promptly. Indicators may include rent arrears, debt, domestic abuse, anti-social behaviour, or eviction notices.

Referrals to housing services do not replace referrals to **Children's Social Care** where harm or risk of harm is identified. For 16- and 17-year-olds living independently, the DSL ensures appropriate interventions and support through Children's Services. Children's services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

41. Special Circumstances

41.1 Alternative Provision (AP)

KCSiE 2026 states that "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 need. The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff)."
Where pupils attend AP, the school remains responsible for their safeguarding. AP providers often serve pupils with complex needs and heightened safeguarding risks.
The **DSL** oversees:

- Safeguarding checks for AP staff
- Two-way sharing of safeguarding information
- Monitoring attendance and reporting non-attendance or children going missing
- Quality assurance of AP safeguarding arrangements

No pupil is placed with an AP before the **AP Suitability form** is completed and approved by the Headteacher/DSL. The DfE has published voluntary national standards for non-school alternative provision.

41.2 Work Experience

The school has detailed safeguarding procedures for found in the Work Experience Policy, including provider checks and supervision, aligned with **Keeping Children Safe in Education 2026**. Guidance is available on the school shared drive and overseen by the Headteacher/DSL.

41.3 Children and the Court System

The school supports children giving evidence in criminal courts or navigating family court arrangements. Guidance in **KCSiE 2026** and the **Ministry of Justice Child Arrangements Tool** is used to ensure children are supported and informed throughout the process. It is a useful resource which contains video links to explain processes.

It can be very stressful for learners and their families to be going through a family court proceeding. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for parents/carers.

41.4 Children with Family Members in Prison

Approximately 200,000 children are affected by parental imprisonment annually. These children may experience poverty, stigma, isolation, and poor mental health. The school supports these pupils through **pastoral care, early help, and liaison with parents/carers or family members** as appropriate.

42. Key Contacts

Headteacher: Stuart Henderson Andrews
DSL: Stuart Henderson Andrews
Deputy DSL: Danielle Doherty
Deputy DSL: Tara Ahmed

Coventry MASH: 024 7678 8555
LADO: 024 7527 8518
Police: 101 (or 999 in an emergency)
NSPCC Whistleblowing Advice Line: 0800 028 0285