



Safeguarding and Child Protection Policy

Approved by: Karen Pickles
Designated Safeguarding Lead

Date: 1st September 2025

POLICY REVISION RECORD

Date	Section	Revision	Updated by
09/09/20	update KCSIE 2020	updating all references to KCSIE	Karen Pickles
06/10/21	update KCSIE 2021	updating all references to KCSIE	Karen Pickles
10/10/22	update KCSIE 2022	updating all references to KCSIE	Karen Pickles
09/02/23	Re-written policy	Re-styled to include all above plus NMS requirements	Karen Pickles
12/09/23	Update KCSIE	Updating all references to KCSIE	Karen Pickles
16/12/23	Update to BG	Updated all references to DDSL	Karen Pickles
23/05/24	Update to EP signpost	Update to include signpost to Emergency Procedures	Karen Pickles
01/09/24		Updated in line with KCSIE 2024 and reviewed	Karen Pickles
01/09/25		Updated in line with KCSIE 2025 and reviewed	Karen Pickles

Safeguarding Contact Details – Berkeley Guardians

1. Internal Safeguarding Lead

Position Designated Safeguarding Lead (DSL) Name Mrs Karen Pickles Contact 07565 493818
karen@berkeleyguardians.com

2. Children's Social Care (First Response)

- Professional referrals: 0117 903 6444
- Out-of-hours / Emergency Duty Team: 01454 615 165
- Online referral: <https://www.bristol.gov.uk/social-care-health/make-a-referral-to-first-response>
- Local procedures:
https://www.proceduresonline.com/swcpp/bristol/p_report_concerns.html

3. Prevent Concerns

Children Use Children's Social Care (First Response) contacts above for any safeguarding concerns involving radicalisation.

Adults

- Bristol Care Direct (Mon–Fri 8:30–17:00): 0117 922 2700
- Emergency Duty Team (out of hours): 01454 615 165
- Online referral: <https://www.bristol.gov.uk/residents/social-care-and-health/adults-and-older-people/adult-care-referral-form>

4. Police Prevent Team

- Non-emergency: dial **101**, ask for "Prevent Team"
- Dedicated regional Prevent line: **01278 647 466** (Counter Terrorism Policing South West)
- Channel referrals email: channelsw@avonandsomerset.pnn.police.uk

5. Emergency & Non-Emergency Reporting

- **Immediate danger:** call **999**
- **Silent solution:** text "register [Name] [Address]" to 999, then follow prompts to send a silent alert
- **Non-urgent concerns:** call **101**
- **Anonymous tip-off:** Crimestoppers on **0800 555 111**

6. Female Genital Mutilation (FGM) Reporting

- **Mandatory duty:** regulated professionals must report known or suspected FGM on under-18s to police via 101 within 24 hours.
- **Immediate danger:** call 999 (use silent solution if you cannot speak).
- **Historic/non-urgent cases:** call 101 or Crimestoppers 0800 555 111.
- **FGM Helpline (NHS England):** 0800 028 3550

7. Other Key Safeguarding Contacts

Service	Contact	Notes
Childline	0800 1111 / https://www.childline.org.uk	24/7 support for under-19s
CEOP	https://www.ceop.police.uk/safety-centre/	Report online sexual exploitation
Kidscape	0300 102 4481 / WhatsApp 07496 682 785	Parent advice and anti-bullying resources
Report Abuse in Education	https://www.reportabuseineducation.org.uk	Anonymous reporting for education settings
NSPCC Helpline	0808 800 5000 / help@NSPCC.org.uk	24/7 advice for adults concerned about a child
National Domestic Abuse Helpline	0808 2000 247 / https://www.nationaldahelpline.org.uk	24/7 support for domestic abuse victims

NB: List of relevant documents used to write this policy at end of this policy document.

1. Introduction

Berkeley Guardians is unequivocally committed to safeguarding and promoting the welfare and wellbeing of every young person and member of staff in our care. We believe that everyone – without exception – has the right to:

- *live free from harm, abuse, exploitation and discrimination*
- *be treated with dignity, fairness and respect*
- *have their voice heard and their views considered in all matters affecting them*

We recognise that children learn and thrive when they are healthy, safe, secure and feel confident to share worries or concerns. Safeguarding and promoting welfare means:

- *protecting children from maltreatment*
- *preventing impairment of their mental and physical health or development*
- *ensuring they grow up in circumstances that provide safe, effective care*
- *taking timely action to enable all children to achieve the best possible outcomes*

This policy applies to all Berkeley Guardians staff, directors, volunteers, contractors and host families, and underpins our close-working partnerships with schools, local authorities and other safeguarding agencies. It covers any setting or activity in which staff or host families are working with pupils.

A copy of this policy is published on our website and is available in large-print or alternative formats on request.

Statutory Framework and Guidance

- *Keeping Children Safe in Education (DfE September 2025)*
- *Working Together to Safeguard Children (HM Government July 2023)*
- *Prevent Duty Guidance for England and Wales (Home Office July 2023)*
- *Education (Independent School Standards) Regulations (April 2019)*
- *National Minimum Standards for Boarding (DfE September 2022)*
- *What to Do If You're Worried a Child Is Being Abused (DfE March 2015)*
- *Safeguarding Children and Young People (Independent Schools Inspectorate July 2022)*
- *Children Missing Education (DfE September 2016)*
- *Charity Commission: Safeguarding and Protecting People (2019)*
- *Equality Act (2010) and Human Rights Act (1998)*

Our Commitment to Continuous Improvement

We maintain active membership of SACPA, BSA and AEGIS, and draw on NSPCC training and sector-wide briefings to ensure our staff, host families and governors remain abreast of emerging risks, legislation and best practice—preparing us for forthcoming duties such as mandatory reporting under the Crime and Policing Act.

2. Principles

Berkeley Guardians requires all staff and host families to share our commitment to safeguarding and promoting the welfare of every pupil. We aim to create a secure environment with strong pastoral support so that any child who has experienced abuse can report it confidently, without shame, and receive full support.

- Maintain clear, confidential reporting routes and take every concern seriously.
- Ensure DSL and DDSL are trained to listen, identify risks early, follow agreed procedures and liaise with the pupil's school.
- Apply rigorous safer-recruitment checks to all staff and host families to confirm suitability.
- Work alongside multi-agency partners, schools and local authorities to provide early intervention and coordinated support.
- Stay vigilant for signs of abuse—whether in homestays, schools or external settings—and protect pupils from adults or peers.
- Manage allegations sensitively to support victims, follow child-protection plans and safeguard innocent staff from false claims.
- Accommodate pupils' physical and mental health needs through tailored care and clear health-and-safety protocols.
- Enforce homestay policies on drugs, alcohol and substance misuse.
- Assess and mitigate risks of radicalisation, identify pupils vulnerable to extremist ideas and act in line with the Prevent Duty.
- Secure host-family premises to the greatest extent practicable.
- Provide incoming pupils with up-to-date safeguarding guidance before they arrive in the UK.
- Routinely review safeguarding procedures and promptly address any deficiencies.

3. Roles and Responsibilities

Safeguarding and child protection are everyone's responsibility. All staff, host families and volunteers must:

- Provide a safe environment where pupils can live, study and relax.
- Prioritise the best interests of each pupil and support them to achieve positive outcomes.
- Attend annual safeguarding and child-protection training (and additional sessions if directed by the DSL).
- Recognise indicators of abuse, neglect, mental-health needs, radicalisation and extremism.
- Follow our safeguarding procedures independently when required.
- Record all significant concerns, conversations or events accurately and promptly.
- Report any safeguarding concerns to the DSL (or DDSL) without delay and cooperate with social care or other agencies after referral.

3.1 The Designated Safeguarding Lead (DSL)

The DSL is a senior member of the leadership team with ultimate responsibility for safeguarding, child protection and online safety. Berkeley Guardians ensures the DSL has the time, funding and resources to fulfil their duties.

Key Responsibilities

- **Managing Referrals**

- Refer concerns of abuse, neglect, radicalisation or other harms to Local Authority Children's Services, the Channel programme, DBS and/or police.
- Track progress and follow up on multi-agency actions.
- **Multi-Agency Liaison**
 - Act as the principal contact for staff, host families, parents and schools on safeguarding matters.
 - Foster supportive partnerships with local safeguarding partners, social care and law enforcement.
- **Record-Keeping & Information Sharing**
 - Maintain an up-to-date, confidential child-protection file with clear records of decisions and actions.
 - Securely transfer records to a pupil's new school or relevant agency without delay.
- **Policy Review & Awareness**
 - Review and update the Safeguarding Policy at least annually (or sooner to reflect legislative changes such as KCSIE 2025).
 - Ensure all staff and host families understand the policy, know how to access it, and are aware that referrals may be made.
- **Training, Knowledge & Online Safety**
 - Complete advanced DSL training and regular updates on child-protection, online risks and the Prevent Duty.
 - Advise on safe use of technology and filtering/monitoring systems.
- **Supporting Staff & Host Families**
 - Provide ongoing guidance, mentoring and supervision on welfare and safeguarding concerns.
 - Build staff confidence in identifying risks and making referrals.
- **Listening to Children**
 - Promote a culture of listening, respect and pupil voice in all safeguarding matters.
 - Help staff and host families form trusted relationships that encourage children to share concerns.

4. Staff Training

4.1 Induction

All new staff, volunteers and host families (over 16) receive formal child-protection training before working with pupils. This covers:

- Our Safeguarding Policy and related policies (Preventing Bullying & Cyber-bullying, E-Safety, Mental Health, Prevent)
- Part 1, Part 4 and Annex B of KCSIE
- DSL and DDSL roles, contacts and Referral Procedures
- Acceptable Use of IT, Online Safety guidelines and Staff Code of Conduct (including low-level concerns)
- Whistleblowing Policy and LSCP procedures overview

Key documents are issued in paper or electronically, accessible via our shared drive, and staff must confirm they have read and understood them.

4.2 Mandatory Updates

- All staff (including Directors) complete whole-staff child-protection and safeguarding training every two years (per LSCP guidance).
- Annual refresher sessions, e-bulletins and policy re-issues ensure everyone remains up to date.
- Safer Recruitment training is provided to all involved in hiring panels.
- Training partners include NSPCC, Three Rivers, AEGIS, BSA/SACPA, covering Online Safety and the Prevent Duty.

4.3 Targeted Training

The DSL team regularly reviews and tailors training to address emerging risks and local needs, for example:

- Mental health first aid
- Peer-on-peer abuse, sexual violence and harassment
- Online safeguarding and cyber-exploitation
- Radicalisation and the Prevent Duty
- Child sexual and criminal exploitation
- Female Genital Mutilation (FGM) awareness

Host families complete the AEGIS online safeguarding modules, updated regularly.

4.4 DSL & DDSL Professional Development

DSL

- Advanced Level 3 DSL qualification, refreshed every two years
- Prevent awareness, Online Safety, Safer Recruitment, First Aid and Mental Health training (annual updates as required)
- Ongoing professional development in:
 - Promoting a culture of listening to children
 - Early help assessment and multi-agency intervention
 - Local child-protection conference processes
 - Supporting pupils with SEND or other vulnerabilities

DDSL

- Level 3 DSL training, Online Safety, Safer Recruitment, First Aid and Mental Health Awareness
- Provides cover for the DSL and supports staff with welfare and safeguarding queries

5. Early Help and Support

Berkeley Guardians believes that timely, “early help” prevents problems from escalating. We recognise that pupils may face stress, peer pressure, body-image worries, mental-health or relationship challenges and ensure staff understand these risks.

Pupils are encouraged to speak up at the first sign of difficulty—either to their host family or directly to the DSL—so we can provide targeted support without delay.

When a member of staff identifies a pupil who may benefit from early help, they must consult the DSL. The DSL will apply the Bristol Safeguarding Children Partnership’s threshold criteria, agree next steps and work closely with the pupil’s school.

Certain pupils are particularly vulnerable and may need proactive support:

- Disabled pupils or those with SEN/EHC plans
- Learners for whom English is an additional language
- Young people in private foster care
- First-time boarders living away from home
- Pupils facing challenging family circumstances
- Those showing early signs of anti-social or criminal behaviour
- Young people misusing alcohol or drugs
- Pupils at risk of radicalisation or exploitation
- Those exhibiting early indicators of abuse, neglect or mental-health issues
- Young people subject to discrimination based on race, faith, sexuality, gender identity or other protected traits

Abuse or neglect can be harder to spot in these groups because:

- Behaviour changes may be attributed solely to a disability
- SEND/EAL pupils are more prone to isolation or prejudice-based bullying
- Hidden impact of peer-on-peer abuse without obvious signs
- Communication or cognitive barriers hinder disclosure
- Difficulty distinguishing online content from reality, leading to repeated harmful behaviour

Early identification and tailored support ensure every pupil in our care can thrive safely.

6. Recognising Need for Support

All staff and host families must stay alert to indicators that a pupil may need help or protection. Children may not recognise or know how to disclose abuse, neglect or exploitation. Building trusting relationships, exercising professional curiosity and speaking to the DSL/DDSL at the first sign of concern reduce barriers to disclosure.

6.1 Understanding Abuse and Harm

Abuse or neglect can be an act or omission that causes—or fails to prevent—harm. It can occur:

- Within families, institutions or the community
- Face-to-face or wholly online (using technology to facilitate abuse)

- By adults or other children (child-on-child abuse)
- As serious bullying, which becomes a child-protection issue when significant harm is suspected

6.2 Four Main Categories of Abuse

1. Physical Abuse
 - Hitting, shaking, burning, drowning, suffocation or other physical harm
 - Fabricating or inducing illness
2. Emotional Abuse
 - Persistent maltreatment causing adverse emotional development
 - Conveying worthlessness, silencing or excessive expectations
 - Includes serious bullying, witnessing domestic abuse, exploitation
3. Sexual Abuse
 - Forcing or enticing a child into sexual activities, with or without violence
 - Contact acts (penetrative or non-penetrative) and non-contact acts (grooming, sharing sexual images)
 - Can be perpetrated by adults or other children
4. Neglect
 - Persistent failure to meet basic physical or psychological needs
 - Failing to provide food, shelter, supervision or medical care
 - Neglect of a child's emotional needs

6.3 Other Forms of Harmful Exploitation

Staff should also be aware of:

- Child Criminal Exploitation (CCE) and County Lines
- Child Sexual Exploitation (CSE)
- Children Missing from Education
- Child-on-Child Abuse, including Sexual Violence & Harassment
- Domestic Abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced Marriage
- Radicalisation & Extremism

7. Contextual Safeguarding

All staff and host families must recognise that pupils' safety and wellbeing are influenced by environments beyond home and school. Contextual safeguarding (Keeping Children Safe in Education, Part 1; Working Together 2023) requires us to assess risks arising in the community, online and peer groups, and to respond accordingly.

- Awareness of Extra-Familial Harms • Sexual exploitation and grooming (CSE) • Criminal exploitation and county-lines (CCE) • Serious youth violence, gangs and knife crime • Hate-motivated abuse (race, religion, sexuality, gender identity) • Modern slavery, trafficking and radicalisation • Online harms and image-based sexual abuse

- **Listening and Logging Concerns** • Use CPOMS (or our secure incident log) to record contextual concerns—what happened, where and who was involved. • Note patterns of behaviour or hotspots (e.g., unsupervised gathering places, routes to school). • Exercise professional curiosity: ask open questions about a pupil’s friendships, community activities and online contacts.
- **Reporting and Referral** • Escalate contextual risks immediately to the DSL/DDSL for a multi-agency risk assessment under the Bristol Safeguarding Children Partnership thresholds. • Work with schools, police, youth offending teams and community organisations to share intelligence and coordinate interventions. • Develop a contextual risk-management plan with clear actions, timescales and review dates.
- **Prevention and Partnership** • Include contextual risks in homestay risk assessments and health-and-safety reviews. • Educate pupils on how to identify and avoid dangerous situations outside school and home. • Engage local stakeholders—transport providers, sports clubs, faith groups—to build safer community networks. • Ensure that contextual safeguarding features in annual policy reviews, staff training and homestay inductions.

By embedding contextual safeguarding in our daily practice, we ensure that pupils are protected from harm wherever it occurs and can access support as soon as they need it.

8. Listening to Pupils and Record-Keeping

Berkeley Guardians ensures pupils can raise concerns safely—through their host family, Guardian Angel, or directly to the DSL/DDSL. “Help and Advice” posters (Childline, Children’s Commissioner) are displayed in homestays, and our safeguarding leaflet is issued before arrival in the UK.

8.1 Responding to a Disclosure

- Immediately stop other activities; give the pupil your full attention.
- Listen carefully, allow silences, keep an open mind.
- Ask only brief, open questions for clarification (what, when, where), avoiding leading or multiple-choice prompts.
- Do not investigate, judge or promise absolute confidentiality. Explain that you must share with the DSL to ensure proper action (KCSIE 2025, Part One; Working Together 2023).
- Report verbally to the DSL/DDSL without delay. Share further only on a strictly need-to-know basis.

8.2 Recording the Disclosure

Record the disclosure as soon as possible using CPOMS or our secure incident log. Entries must be:

- Factual and precise, using the pupil’s own words in quotation marks.
- Date-, time- and place-stamped.
- Inclusive of non-verbal behaviours (e.g. facial expressions, body language).
- Documenting who was present or informed.

Any physical evidence (notes, devices, clothing) must be kept intact and handed to the DSL immediately for secure scanning and filing. Do not create or retain personal copies.

8.3 Online Material

Under no circumstances should staff or host families view or forward suspected illegal images of a child. If an incident involves indecent images or digital content:

- Secure the device without examining the content.
- Seek DSL guidance and follow the DfE “Searching, Screening and Confiscation” (2025) and UKCIS “Sharing Nudes and Semi-Nudes” (2020) protocols.

By listening attentively and keeping accurate, confidential records, we ensure every pupil’s voice is heard and acted upon in line with statutory guidance.

9. Procedure for Concerns About a Pupil’s Welfare

When any member of staff or a host family becomes worried that a pupil’s welfare may be at risk—even if you are unsure—act without delay.

9.1 Immediate Actions

- Report verbally to the DSL (or DDSL) as soon as possible.
- If the concern is an allegation against a staff member or host family, follow the “**Allegations Against Staff**” procedure (Section 12).
- Do not assume someone else will share the information.
- Record all details in writing immediately (CPOMS or secure incident log):
 - Date, time, location and people involved
 - Exact words spoken by the pupil (in quotation marks)
 - Your observations, actions taken and who you notified
- Follow any instructions given by the DSL. Take no further action unless directed.

9.2 Female Genital Mutilation (FGM)

- If you discover that FGM appears to have been carried out on a girl under 18, you **must** report it to the police immediately (Children Act 2004; Serious Crime Act 2015).
- Notify the DSL as soon as you are able, unless you have a compelling reason not to do so.

9.3 Preventing Radicalisation

- Concerns that a pupil is at risk of radicalisation or extremist ideologies must be reported to the DSL under the **Prevent Duty** (Counter-Terrorism and Security Act 2015).
- The DSL will consider a Channel referral in line with local multi-agency procedures.

9.4 Mental Health and Early Help

- If the concern relates to a pupil's mental health or wellbeing, discuss it with the DSL promptly.
- The DSL may initiate an Early Help assessment (Working Together to Safeguard Children 2023) and liaise with the school and external agencies.

9.5 Direct Referral to Children's Social Care

In exceptional circumstances—such as imminent risk or lack of appropriate response—you or the host family may refer directly to children's social services. If you do so:

- Inform the DSL as soon as possible.
- Keep a written record of your referral and any feedback received.

9.6 Escalation and Review

- If you believe the pupil remains at risk after reporting, escalate to the local authority's Designated Officer or the NSPCC helpline.
- The DSL will review all welfare concerns at least termly, monitor patterns and update risk assessments in line with KCSIE 2025.

10. Duties of the DSL on Notification of a Concern

When notified of any welfare or safeguarding concern, the DSL will:

- Consider whether the matter meets the threshold for a statutory referral to children's social care or the pupil's school.
- Decide if an immediate referral to the police or the Channel programme (Counter-Terrorism and Security Act 2015) is required.
- If the concern does not meet statutory thresholds, determine whether early help is appropriate (Working Together 2023).
- Keep the pupil's wishes and feelings at the centre of all decisions.
- Record the rationale for every decision and action taken.

10.1 Decision-Making Factors

When deciding next steps, the DSL will weigh:

- The pupil's best interests and safety
- Nature, seriousness and context of the concern
- Local Authority safeguarding thresholds (Bristol SCP criteria)
- Pupil's age, understanding and views
- Multi-agency safeguarding procedures and information-sharing protocols
- Any known patterns or contextual risks affecting the pupil

10.2 Early Help and Review

If early help is chosen:

- Work jointly with the pupil's school and other agencies to agree a support plan.
- Monitor progress and review within agreed timescales.
- Refer to children's social care without delay if the pupil's situation does not improve.

10.3 Record-Keeping

The DSL team will maintain confidential records for every concern, including:

- A clear summary of the issue and pupil's views
- Details of actions taken, decisions made and referrals initiated
- Outcomes and any further plans

Access to these records is restricted to the DSL and authorised deputies only.

10.4 Statutory Referrals

Child in Need

- When a pupil has unmet needs falling below the threshold of significant harm, the DSL will refer to children's social care under the Children Act 1989.
- Parental consent is not required, but where possible parents should be involved in the process.

Child at Risk of Harm

- If a pupil is in immediate danger or at risk of significant harm, the DSL will make an urgent referral to children's social care and/or the police.
- Notify the school's DSL if the pupil attends another setting.

10.5 Referral Confirmation and Escalation

- Confirm any telephone referral in writing within 24 hours.
- Expect written feedback from children's social care within one working day.
- If no response is received, the DSL will re-contact children's social care to escalate.
- Anyone can make a direct referral in exceptional circumstances; the DSL must be informed as soon as possible.

10.6 Multi-Agency Cooperation

- Collaborate fully with children's social care, police and the Channel panel.
- Provide information promptly—within five to ten working days—for Prevent or police enquiries.
- Contribute to strategy meetings, child-protection conferences and planning.

10.7 Unsubstantiated or Malicious Reports

- If a referral is deemed unsubstantiated, the DSL will consider whether the pupil or reporter needs support or further assessment.
- In cases of deliberately false or malicious allegations, the Guardianship will consider disciplinary action in line with staff or host-family conduct procedures.

11. Informing Parents

Parents or carers will normally be told if we take any safeguarding action concerning their child. However, the DSL may delay or withhold information if:

- Consulting the LADO, children's social care or the police indicates that parental notification could compromise an investigation or place the child at further risk (KCSIE 2025, Part Four).
- In cases of suspected honour-based abuse or forced marriage where informing parents may increase risk.

Key points:

- For **Channel referrals**, the DSL will consider whether to seek the pupil's or parent's consent before sharing information, balancing confidentiality, public protection and the individual's welfare (Prevent Duty Guidance 2023).
- When we refer a concern to social services, the police or a school's DSL, we will inform parents/carers and the pupil in writing of their right to make their own referral, with clear contact details for local children's services and the police.
- **Parental consent is not required** for any statutory safeguarding referral. Staff must always act in the best interests of the child, even if this conflicts with parental wishes.

12. Allegations Against Staff and Host Families

Allegations that a member of staff or host family may have:

- Harmed or placed a child at risk of harm.
- Committed a criminal offence against or related to a child.
- Behaved in a way suggesting unsuitability to work with children (including domestic violence or other concerning behaviour in personal life).

These fall under the “**Harms Threshold**” (KCSIE 2025, Part Four).

12.1 Safer Working Practices

All adults must follow our Staff Code of Conduct, avoid one-to-one unsupervised situations with pupils and recognise situations that could lead to misunderstandings or allegations.

12.2 Reporting an Allegation

- **Immediate reporting:** Allegations about staff or host families must go straight to the DSL. If the allegation concerns the DSL, report to the DDSL or the Chair of Trustees.
- **No informal investigation:** Until the LADO is consulted, do not interview the child, staff member or gather evidence that could jeopardise a police inquiry.

12.3 Liaison with the LADO

Within one working day the DSL (or case manager) will:

- Conduct basic fact-finding enquiries (dates, times, witnesses) without interviewing the accused.
- Consult the Local Authority Designated Officer to decide whether the allegation meets the harms threshold and agree next steps.
- Record all discussions, rationale and actions agreed with the LADO.

12.4 Investigation and Outcomes

- If the LADO and DSL decide no further action is needed, record the decision, inform the individual and agree what feedback is appropriate.
- If there is an immediate risk to children or evidence of a crime, involve police from the outset in consultation with the LADO.
- **Non-recent allegations:** Historic abuse disclosed by an adult or pupil must be reported to the police and LADO under local multi-agency procedures.

12.5 Malicious or False Allegations

- If an allegation is proven malicious or unfounded, consider whether the reporter needs support or if disciplinary action is warranted under our Staff or Host-Family Conduct Policy.

All steps will be handled in line with

- Keeping Children Safe in Education (DfE September 2025)
- Working Together to Safeguard Children (HM Government July 2023)
- Local Safeguarding Children Partnership procedures regarding allegations management.

12. Disclosure of Information

When an allegation meets the harms threshold and the LADO has been consulted:

- The case manager will inform the accused adult in writing as soon as possible, sharing only the allegation's nature and process.
- Parents or carers of the pupil will be notified promptly—unless doing so would impede a police or children's services investigation.
- Any decision on what, when and how to share information will comply with data-protection law (UK GDPR, Data Protection Act 2018) and the advice of external agencies.
- Parents will receive updates only on matters affecting their own child; no personal data about the accused adult will be disclosed.

13. Investigation Process

1. **Lead Investigator**
 - A senior staff member (case manager), under LADO direction, usually conducts the inquiry.
 - External agencies (police, children's social care) may lead where criminal or statutory safeguarding investigations are required.
2. **Cooperation and Timing**
 - The Guardianship will fully support any external inquiry and defer internal disciplinary action until those investigations conclude.
 - The case manager will review progress at four weeks, then at least every two weeks, to ensure a fair and timely process.
3. **Continuity of Investigation**
 - Investigations proceed even if the accused resigns or withdraws from duties.
 - All records—nature of the allegation, evidence, decisions—are retained securely.
4. **Outcome Definitions**
 - Substantiated: sufficient evidence to prove the allegation.
 - Malicious: evidence disproves the allegation and shows intent to deceive or harm.
 - False: evidence disproves the allegation.
 - Unsubstantiated: insufficient evidence to confirm or refute the allegation.
 - Unfounded: no evidence or proper basis for the allegation.
5. **Notification of Outcome**
 - The accused is informed in writing of the investigation's result and any next steps.

14. Support for Accused Adults and Pupils

- **Duty of Care to Staff/Host Families**
 - A named representative will keep the accused adult informed of the process.
 - Access to counselling, occupational health or medical advice is provided as needed.

- Unless prohibited by investigative agencies, social contact with colleagues and friends is permitted.
- **Support for the Pupil and Their Family**
 - Pupil welfare is reviewed continuously; pastoral support or external referrals are arranged.
 - Parents receive guidance on accessing specialist support (counselling, advocacy).
 - The DSL liaises with social services or police to agree the most appropriate way to help the child recover.

By ensuring clear information-sharing, a robust investigation framework and tailored support, we protect both children's welfare and the rights of those subject to allegations.

13. Confidentiality and Information Sharing

Maintaining confidentiality safeguards the integrity of investigations and protects all parties' privacy. Berkeley Guardians complies with UK GDPR, the Data Protection Act 2018 and the Contempt of Court Act 1981, ensuring information is only shared on a strict need-to-know basis.

13.1 Informing Key Individuals

- Case manager consults the LADO, children's social care and/or police before notifying the accused adult or the pupil's parents.
- The accused is informed in writing of the allegation and process as soon as permitted.
- Parents/carers receive timely updates about their own child's welfare, but no personal data about the accused is disclosed.
- Decisions on wider disclosure (e.g. to host families, partner schools or the media) are made in consultation with external agencies and our Directors.

13.2 Managing Speculation and Press Interest

- All staff and host families are reminded not to comment publicly or on social media.
- Leaked or unauthorised disclosures may prompt a separate investigation or disciplinary action.
- Media enquiries are referred to the DSL and Directors, who coordinate any approved statements.

13.3 Police-Led Investigations

- Where the police lead, we seek their agreement to share statements and evidence for any subsequent internal disciplinary processes.
- Internal disciplinary proceedings are paused until criminal or statutory safeguarding inquiries conclude.

13.4 Handling Allegation Outcomes

13.4.1 Unsubstantiated, Unfounded or Malicious Allegations

- If a pupil's claim is deemed unsubstantiated or malicious, the DSL will consider whether the pupil or reporter requires support or further safeguarding assessment.
- Allegations found to be deliberately false may result in disciplinary action or referral to the police.

13.4.2 Substantiated Allegations

- When an adult is dismissed or removed for posing a risk to children, a referral to the Disclosure and Barring Service is made within one month (Safeguarding Vulnerable Groups Act 2006).
- Settlement agreements that conceal the risk of harm are prohibited; resignation does not override our duty to refer.

13.5 Post-Investigation Review

- The DSL and case manager conduct a lessons-learned review with the LADO to assess: • adherence to statutory guidance (KCSIE 2025; Working Together 2023) • the effectiveness of information-sharing protocols • whether additional training or procedural changes are needed
- A written report of findings and recommendations is submitted to the Directors promptly.

By rigorously controlling information flow and reviewing each case, we uphold both child protection and data-protection standards.

15. Low-Level Concerns

Berkeley Guardians promotes a culture of openness, trust and transparency, where any concern about an adult's behaviour—no matter how small—is reported and addressed promptly.

15.1 Definition

A low-level concern is any behaviour by an adult that:

- Falls short of our Code of Conduct, inside or outside work
- Causes unease or a "nagging doubt"
- Does not meet the harms threshold for a LADO referral (KCSIE 2025, Part Four)

Behaviour can range from inadvertent thoughtlessness to actions that—if unchecked—might enable abuse. Examples include:

- Excessive familiarity with pupils
- Showing unexplained favouritism
- Taking pupil photographs on personal devices
- Humiliating or singling out a pupil

15.2 Reporting

- All staff and host families must report low-level concerns without delay to the DSL or, if the concern involves the DSL, to the DDSL.
- You do not need to decide whether it crosses the allegation threshold; the DSL/DDSL will determine this, consulting the LADO if uncertain.
- Adults who believe they have behaved in a way that may cause misunderstanding should self-refer to the DSL immediately.

15.3 Recording and Storage

- The DSL logs every low-level concern—substantiated or not—in a secure, confidential register.
- Entries include: date, context, details of the concern, actions taken, decisions made and outcome.
- Reporters' names are recorded; anonymity is respected wherever reasonably possible.
- Records are held in accordance with the Data Protection Act 2018 and UK GDPR and retained until the individual's engagement with Berkeley Guardians ends.

15.4 Escalation

- If a pattern of low-level concerns emerges, the DSL will review whether the accumulated evidence meets the harms threshold and should be referred to the LADO.
- The DSL, DDSL and Directors review low-level concerns termly to identify trends, policy gaps or training needs.

15.5 References and Employment

- Low-level concerns that remain below the harms threshold and are safeguarding-only will not be disclosed in employment references.
- If a concern (or group of concerns) meets the threshold and is substantiated, a LADO referral is made and may be included in references in line with statutory guidance.

By capturing and acting on low-level concerns, we reinforce behavioural standards and protect children, staff and host families alike.

16. Arrangements for Dealing with Child-on-Child Abuse

Most peer-on-peer incidents are managed under our Behaviour and Anti-Bullying Policies. However, any behaviour by one pupil towards another that raises safeguarding concerns must be handled under this policy (KCSIE 2025, Part Five).

16.1 Examples of Child-on-Child Abuse

- Bullying (including cyberbullying, prejudice-based or discriminatory)
- Abuse in intimate peer relationships
- Physical violence or threats (hitting, kicking, shaking, biting, hair-pulling)
- Sexual violence (rape, assault by penetration, sexual assault)
- Sexual harassment (comments, jokes, online harassment)

- Coerced sexual activity (forcing stripping or sexual acts)
- Upskirting (taking non-consensual images for sexual gratification)
- Sharing nude/semi-nude images (“sexting”)
- Hazing or initiation rituals involving abuse or humiliation

Pupils with SEND, girls (particularly for sexual abuse) and LGBT+ children are at increased risk and require heightened vigilance.

16.2 Reporting and Initial Response

- Any disclosure or concern must be reported immediately to the DSL/DDSL.
- Staff follow “Listening and Record-Keeping” procedures (Section 8), noting exact words, context and witnesses.
- Less serious incidents may be managed with restorative approaches, but every allegation is logged.

16.3 Assessment and Thresholds

On notification, the DSL will:

- Check if the Local Authority Children’s Services threshold for significant harm is met (Working Together 2023).
- Refer promptly to children’s social care and/or police when required.
- Manage lower-level cases with an internal safeguarding plan and behaviour sanctions, liaising with the school’s DSL.

16.4 Risk Assessment and Safeguarding Plans

For all child-on-child incidents, a written welfare risk assessment is completed with input from the school (if relevant). It considers:

- The victim’s wishes and feelings
- Ages, developmental stages and any power imbalances
- Whether the incident is isolated or part of a pattern
- Contextual factors (location, peer group dynamics, online elements)
- Ongoing risks to all involved

Actions may include temporary host-family re-placement, supervised contact, counselling, peer mentoring or external referrals.

16.5 Police Interviews and Appropriate Adults

- If police interviews are necessary, parents are informed and an appropriate adult (guardian or school staff) attends.
- If parents are overseas, the pupil’s education guardian or designated member of staff acts as appropriate adult.

16.6 Ongoing Support

Both the alleged victim and alleged perpetrator are viewed as “children in need” and receive tailored support. The DSL monitors progress, reviews risk assessments regularly and updates safeguarding measures until the case is closed.

17. Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment between pupils is never acceptable. All staff and host families must respond in line with KCSIE 2025 Part 5, Working Together 2023 and DfE guidance on Sexual Violence and Harassment (2021).

17.1 Definitions

- **Sexual Harassment** (“unwanted conduct of a sexual nature”):
 - Comments or jokes about appearance, sexualised name-calling, taunting.
 - Physical acts (brushing against someone, clothing interference, upskirting).
 - Online harassment (non-consensual image sharing, explicit messages, grooming).
- **Sexual Violence** (criminal offences):
 - Rape, assault by penetration, sexual assault.
 - Coercing someone into sexual activity without consent.

Consent requires freedom and capacity to choose and may be withdrawn at any time.

17.2 Vulnerable Groups

Girls, pupils with SEND and LGBTQ+ young people face higher risks. Staff must ensure those groups have trusted adults and clear reporting routes.

17.3 Initial Response

- **Two-Adult Rule:** If possible, have two trained staff present (one DSL/DDSL).
- **Safe Space:** Reassure the pupil, explain next steps, avoid blaming or shaming.
- **Record-Keeping:** Use CPOMS—note exact words, context, witnesses, date/time.
- **No Viewing of Images:** Do not view or forward illegal images; secure devices and consult the DSL on confiscation and police handover (DfE Searching, Screening and Confiscation 2025; UKCIS Sharing Nudes 2020).

17.4 Risk and Needs Assessment

The DSL conducts an immediate **Risk and Needs Assessment**, considering:

- Victim’s wishes and feelings.
- Ages, developmental stages, power imbalances.
- Pattern versus one-off incident.

- Online or offline context.
- Disability or learning needs.
- Sibling or household risks.

Review and update the plan regularly, in liaison with the school's DSL, children's social care or police.

17.5 Management Pathways

1. **Internal Management**
 - Restorative approaches, behaviour sanctions, internal safeguarding plan.
2. **Early Help**
 - Multi-agency support for pupils below statutory thresholds.
3. **Children's Social Care**
 - Referral where significant harm or risk is identified.
4. **Police**
 - Report crimes (rape, assault by penetration) to police; consent for referral not required when risk is high.

Decisions (except purely internal cases) are taken with local MASH and police input.

17.6 Ongoing Support

- **Victim Support:** Access to counselling, specialist services and regular welfare check-ins.
- **Perpetrator Support:** Behaviour interventions, risk reduction work and counselling as needed.
- **Whole-Group Wellbeing:** Debrief peers, reinforce respectful relationships and consent education.
- **Documentation & Review:** DSL maintains detailed records, reviews outcomes and lessons learned to strengthen prevention.

By embedding clear definitions, prompt risk assessments and multi-agency cooperation, Berkeley Guardians ensures every pupil is protected and supported.

18. Other Safeguarding Arrangements

18.1 Mental Health

All staff and host families should recognise that mental health problems can sometimes signal that a pupil has experienced, or is at risk of, abuse, neglect or exploitation.

Where young people have suffered trauma—abuse, neglect or other adverse childhood experiences—these can have lasting effects on their mental health, behaviour and educational progress.

- Staff and host families are well placed to notice changes in mood, sleep, appetite, attendance or social engagement.

- Only appropriately trained professionals should diagnose mental health conditions.
- If a mental health concern also raises safeguarding issues, staff or host families must report it immediately to the DSL or a deputy.
- The DSL may consult external agencies or the child's school DSL to coordinate assessment and support.

18.2 Teaching Pupils to Keep Themselves Safe

Preventative education underpins a culture of zero tolerance towards sexism, misogyny, homophobia, biphobia and sexual violence or harassment.

- Promote personal safety in homestays and the wider world, including safe online practices during remote learning.
- Cover safeguarding topics: radicalisation, grooming, child sexual and criminal exploitation, healthy relationships, mental health, substance misuse, bullying and sexting.
- Reinforce PSHE/RSE lessons from school through daily conversations and examples in the home.
-
- Guardian Angels maintain regular contact via WhatsApp and phone calls to check pupils are safe, happy and settled.
- Pupils are encouraged to speak freely with their Guardian Angel—who has visited them at school and is known to their parents—as a trusted bridge between host family and school.

This combined approach ensures Berkeley Guardians offers both proactive education and responsive care, safeguarding pupils' wellbeing in every environment.

19. Schools and the Guardianship

19.1 Maintaining Strong School Partnerships

Regular, two-way communication with schools ensures a joined-up approach to each pupil's welfare and progress.

- Schools are encouraged to complete homestay checks and feed back via the National Minimum Standards (NMS) channels.
- Berkeley Guardians shares relevant safeguarding information, attendance data and wellbeing updates with the school's DSL.
- Scheduled termly reviews and ad-hoc meetings enable prompt responses to emerging concerns.

19.2 Collaborative Support

Building trust between school staff, host families and Guardian Angels strengthens the support network around each pupil.

- Joint case conferences, where appropriate, include the school DSL, Berkeley Guardians' DSL and host family.
- Agreed action plans—covering behaviour, academic support and pastoral care—are monitored by all parties.
- Feedback loops ensure that any positive progress or new issues are shared and addressed without delay.

20. Online Safety

20.1 Four Categories of Online Risk

Risk Area	Description	Examples
Content	Exposure to illegal, inappropriate or harmful material	Pornography, self-harm sites, extremist propaganda
Contact	Harmful interactions with other users	Grooming, cyber-bullying, identity theft
Conduct	User behaviour that may cause harm	Sharing explicit images, hacking, privacy breaches
Commerce	Financial or commercial risks	Phishing scams, gambling apps, inappropriate advertising

20.2 Host-Family E-Safety Strategies

Host families play a vital role in helping pupils navigate online risks:

- Implement clear e-safety and acceptable-use policies for all devices in the home.
- Where feasible, switch off or restrict internet access at an agreed curfew to deter misuse.
- Remind pupils that they are guests in a family home and should respect household Wi-Fi terms.
- Encourage open dialogue about online friendships, apps and suspicious messages.

21. Mobile Phones and Cameras

21.1 Appropriate Use

To protect pupils' privacy and dignity, homestay members must not take photographs or videos without explicit permission.

- Seek consent from the pupil; if they are under 13, obtain written permission from Berkeley Guardians' DSL.
- Avoid one-to-one images—always include context or additional occupants to reduce risk of misuse.
- Do not capture or display images that could embarrass, distress or exploit a pupil.

21.2 Permissions and Safeguards

Strict rules govern how images and contact information are managed:

- No social-media posting of pupil images under any circumstances.
- Images of vulnerable pupils require prior written approval from parents or legal guardians.
- Host families may store a pupil's mobile number solely for the duration of the stay; remove all contact details immediately upon departure.

22. Staff Recruitment

All staff and host family members aged 16 and over must undergo safer-recruitment checks in line with the Education (Independent School Standards) Regulations 2014 and KCSIE 2025.

- Enhanced DBS check before appointment
- Two satisfactory references, verified directly
- Collection of personal identity and right-to-work documentation
- At least one panel member trained in safer-recruitment techniques
- Ongoing monitoring, including annual review of suitability

23. Children Missing from Homestay Procedures

Unexplained absences may indicate abuse, exploitation or other serious risks. Staff and host families must follow these steps immediately:

1. Record the time and circumstances of the absence.
2. Contact the Guardian Angel and DSL without delay.
3. Follow homestay's emergency contact cascade to locate the pupil.
4. Log all actions taken and any explanations provided by the pupil.
5. If the pupil is no longer under Berkeley Guardians' care but remains in the UK, inform the school of change in guardian status.

Note: Maintain at least two up-to-date emergency contact numbers for every pupil.

24. The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015 (as updated September 2023), Berkeley Guardians must have due regard to preventing radicalisation.

- Partnership working with schools to support vulnerable pupils
- Mandatory training for staff and host families to recognise radicalisation indicators
- Clear referral routes to the DSL and local Prevent coordinator
- Ongoing review of local threat assessments and policy alignment

25. Confidentiality and Information Sharing

Safeguarding records are confidential and shared strictly on a need-to-know basis to protect and promote pupils' welfare.

- Store child-protection files securely, separate from academic records
- Disclose information only to individuals directly involved in safeguarding action
- Cooperate fully with police, children's social care and MASH when required
- Follow Data Protection Act 2018 and GDPR: sharing for safeguarding is lawful and essential
- Use secure channels for special-category personal data; adhere to "Information Sharing" July 2018 guidance

26. Whistleblowing

All staff are required to report to the DSL, DDSL or Directors any concerns about:

- poor or unsafe safeguarding practices in a homestay or in the offices of Berkeley Guardians
- potential failures by the Guardianship or its staff to properly safeguard the welfare of pupils
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of pupils

The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally.

Staff may raise a whistleblowing concern without fear of detrimental treatment or disciplinary action, provided the report is made in good faith. Malicious allegations may be treated as a disciplinary matter.

27. Monitoring this Policy

Any child protection incident within the Guardianship will trigger a review of the relevant safeguarding procedures, either within the Guardianship or the appropriate homestay.

Where an incident involves a member of staff or homestay member, the Local Authority Designated Officer (LADO) will be invited to assist in that review and recommend any procedural improvements.

The DSL will monitor the content and operation of this policy on a day-to-day basis and ensure that any deficiencies or weaknesses in child protection and safeguarding arrangements are remedied without delay.

28. Other Relevant Policies

This policy should be read in conjunction with the following:

- Prevention of Bullying Policy
- Emergency Procedures Policy
- Health and Safety Policy
- Recruitment, Selection and Disclosure Policy
- Code of Conduct for Staff
- E-Safety Policy
- IT Acceptable Use Policy
- Whistleblowing Policy
- Missing Pupil Policy
- Mental Health and Wellbeing Policy
- Prevent Duty Policy
- Mobile Phone Use Policy for Host Families

Appendix 1: Other Types of Abuse

1. Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility. It can be committed by:

- Parents or other family members (often after acrimonious separations or custody disputes)
- Known individuals who are not family (neighbours, friends, acquaintances)
- Strangers, motivated by:
 - Sexual interest in the child
 - A desire to control, dominate or harm the child or their family
 - Emotional or mental health issues
 - Financial gain (ransom or trafficking)

Other local safety incidents—such as strangers loitering near a school or homestay, or unsolicited adults engaging children—must also be reported as potential risks.

2. Children Missing from Education and/or Homestay

Every child of compulsory school age is entitled to a full-time, suitable education. A pupil's unexplained absence from school or homestay may indicate:

- Abuse or neglect, including sexual abuse or exploitation
- Involvement in county lines or criminal exploitation
- Mental health issues or substance misuse
- Risk of travelling to conflict zones
- Threats such as female genital mutilation, honour-based abuse or forced marriage

For prolonged authorised absences (e.g. long-term illness), the Guardianship will collaborate proactively with the school to support both pupil and institution.

3. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both forms of exploitation arise when an individual or group uses a power imbalance to coerce, manipulate or deceive someone under 18:

Child Sexual Exploitation (CSE)

- Involves sexual activities (penetrative or non-penetrative) in exchange for something the victim needs or wants
- May be one-off or a series of incidents, ranging from opportunistic to organised abuse
- Can occur with or without physical contact, including via technology or social media
- Consent is irrelevant if coercion, force or manipulation is involved

Child Criminal Exploitation (CCE)

- Involves coercion into criminal acts (drug running, shoplifting, serious violence) for someone else's benefit
- Exploitation may appear consensual but is driven by threats, violence or debt
- Can be facilitated through technology as well as in person
- Often overlaps with other forms of abuse, including CSE

4. County Lines

"County lines" describes gangs and organised networks exporting illegal drugs using dedicated phone lines or "deal lines." Key points:

- Exploitation of children or vulnerable adults to transport, store and sell drugs
- Use of coercion, intimidation, violence (including sexual violence) and weapons
- Recruitment can occur in schools, care settings or online
- Victims may incur drug debts or face threats to themselves or families if they try to leave

If county-lines involvement is suspected, consider a safeguarding referral (via the National Referral Mechanism) and liaise with local support services.

5. Cybercrime

Cybercrime involves illegal activity via computers or the internet, divided into:

- **Cyber-enabled crimes:** Traditional offences conducted at scale online (fraud, harassment, hate speech)
- **Cyber-dependent crimes:** Offences only possible using computers (hacking, DDoS attacks, malware creation)

Children with strong computing skills may unintentionally or deliberately engage in cyber-dependent crimes. The DSL should consider referral to the Cyber Choices programme to divert at-risk young people toward positive use of their talents.

6. Domestic Abuse

Domestic abuse encompasses a range of behaviours, whether a single incident or a pattern, including:

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

Both parties must be aged 16 or over and personally connected for the legal definition. Children witnessing domestic abuse at home may suffer serious, long-term impacts on their health and learning.

When abuse occurs between young people in intimate relationships (“teenage relationship abuse”), safeguarding procedures apply regardless of the parties’ ages, ensuring both victims and perpetrators receive support.

7. Serious Violence

Staff should be alert to signs that a pupil may be involved in or at risk from serious violent crime, such as:

- Increased school absence or a sudden drop in performance
- New peer groups, especially with older individuals
- Signs of self-harm or unexplained injuries
- Possession of unexplained gifts or cash

Unexplained changes may signal involvement with gangs or criminal networks. Any concerns should prompt immediate safeguarding action.

8. Honour-based Abuse (HBA)

So-called honour-based abuse encompasses crimes committed to protect or defend the “honour” of a family or community. It often involves multiple perpetrators and wider community pressure. All forms of HBA are illegal in the UK and must be treated as abuse.

9. Female Genital Mutilation (FGM)

Female genital mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is a form of child abuse with long-lasting physical and psychological consequences. Girls at risk may not understand what is planned, so approach the subject with sensitivity.

- Any adult who discovers (through disclosure or visual evidence) that FGM appears to have been carried out on a girl under 18 must report it to the police by calling 101 within 24 hours.
- The duty to report lies with the adult who becomes aware, not solely the DSL, though the DSL should be informed unless there is a compelling reason not to.
- Failure to report can result in disciplinary sanctions.

10. Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties, where violence, threats or any other form of coercion are used. Threats may be physical, emotional or psychological. Lack of consent can include situations where a person lacks capacity (for example due to a learning disability). Cultural or religious pressure does not justify coercion and forced marriage is a criminal offence in England and Wales.

11. Modern Slavery

Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including:

- Sexual exploitation
- Forced labour or servitude
- Forced criminal activity
- Organ removal

Statutory guidance on modern slavery details how to identify and support victims, and should be consulted where exploitation is suspected.

Radicalisation and Extremism

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies linked to terrorist groups. Terrorism is defined as any action that endangers or causes serious violence to people, serious damage to property, or serious disruption of electronic systems, intended to influence government or intimidate the public for political, religious or ideological causes. Extremism is vocal or active opposition to fundamental British values—democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs—and includes calls for the death of members of the armed forces.

Young people may be drawn into extremist ideologies for various reasons:

- Seeking answers about identity, faith or belonging
- Desire for adventure, excitement or enhanced self-esteem (“street cred”)
- Attraction to a charismatic individual or group offering support and a sense of identity
- Personal grievances, including experiences of racism or discrimination

Berkeley Guardians has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 (the Prevent duty) to have due regard to the need to prevent people from being drawn into terrorism. This includes non-violent extremism, which can create an environment conducive to radicalisation. Schools and homestays should be safe spaces where sensitive topics—terrorism, extremist ideologies and how to challenge them—can be discussed openly and critically.

There is no single indicator that a young person is susceptible to extremist influences. Staff and host families should remain alert to changes in behaviour, language or social circles that could signal a need for help or protection. Use professional judgment to identify concerns, and always discuss these with the DSL. If the DSL deems it appropriate, a referral should be made to the Channel Programme in collaboration with the pupil's school DSL. This multi-agency approach ensures early intervention and support for those at risk of radicalisation.

Sharing Nudes and Semi-Nudes

The term “sharing nudes and semi-nudes” refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under 18. It is also known as youth-produced sexual imagery or sexting. Creating, possessing or distributing sexual content of anyone under 18 is illegal under the Protection of Children Act 1978 (as amended) and the Sexual Offences Act 2003. Any incident of this nature can indicate risk to a child's wellbeing and must be treated seriously.

When to Notify the DSL

Notify a member of the DSL team immediately if a pupil under 18:

- Has created and shared sexual imagery of themselves with a peer under 18
- Has shared sexual imagery created by another under-18 person
- Is in possession of sexual imagery created by another under-18 person

Management of an Incident

Any disclosure or discovery must be handled sensitively:

- Acknowledge the pupil's embarrassment and anxiety.
- Inform the DSL as soon as possible; do not attempt to manage alone.
- DSL conducts an initial review with relevant staff and pupil(s) to consider:
 - Immediate risk to any child
 - Need to inform the pupil's school DSL
 - Whether to refer to police and/or children's social care
 - Necessity of viewing imagery to safeguard the pupil
 - Extent of image distribution and platforms used
 - Actions to remove or secure images or devices
 - Any factors affecting the pupil's capacity to consent
 - Whether parent involvement would increase risk

Viewing Imagery

Staff must not view sexual imagery unless there is a clear professional reason and it is unavoidable:

- Confiscate devices and power them off; store securely until handed to the DSL or an external agency.
- Only the DSL (or deputy) may view content, and only if it is the sole way to determine next steps.
- Never view imagery if it will cause distress or is not strictly necessary.
- Follow the DfE/UKCIS guidance “Sharing nudes and semi-nudes: advice for education settings” (Dec 2020).

Referral and Record-Keeping

After gathering all relevant information, the DSL decides whether to:

1. Manage internally under safeguarding policies
2. Inform or work with the school DSL
3. Refer to local authority children’s social care
4. Report to the police

Records must capture the information reviewed and the rationale for decisions. A referral to social care or police must be made immediately if:

- An adult is involved in creating or sharing imagery
- There are concerns of coercion, grooming or inability to consent
- Imagery depicts acts beyond the child’s developmental understanding or is violent
- The pupil shows signs of immediate harm, self-harm or suicidal ideation

This policy ensures that all incidents of youth-produced sexual imagery are managed swiftly, sensitively and in line with legal requirements, prioritising the safety and wellbeing of every pupil.

Support

It is vital that pupils receive ongoing support so they understand they are not alone and know how to protect themselves:

- Advise pupils on how to report sexual images or videos to online service providers and trusted adults.
- Explain how to request removal or takedown of content from platforms and delete images from their own accounts.
- Emphasise the importance of not sharing the imagery further under any circumstances.
- Remind pupils that most social media and messaging services have in-app reporting tools; some even allow third-party reports on a child’s behalf.
- Encourage use of specialist reporting channels such as the Internet Watch Foundation (IWF) and Childline’s Report Remove tool for content they believe has been, or may be, shared publicly.

Deletion of Imagery

Where no external referral is required, the Guardianship should consider removing imagery to prevent further circulation:

- Ask the pupil to delete the images or videos and confirm deletion.
- Any decision to search a pupil's device and remove content must be taken by the DSL based on their professional judgement.
- If a device search is authorised, it should be conducted in line with the school's searching and confiscation policy and GDPR principles, minimising intrusion and distress.
- Document the rationale for any device search and content removal actions.

Recording Incidents

Accurate records are essential for accountability and future safeguarding reviews:

- Log every incident involving nudes or semi-nudes, whether referred to police/social care or handled internally.
- Record the date, time, individuals involved, summary of what occurred and actions taken.
- Do not create, store or circulate copies of the imagery under any circumstances.
- Retain all notes and records securely in the pupil's safeguarding file, separate from academic records.

Appendix 2: Further information on signs of abuse

Physical abuse

PHYSICAL SIGNS OF ABUSE	BEHAVIOURAL SIGNS OF ABUSE
<ul style="list-style-type: none"> • Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument • Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks • Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child • Human bite marks • Broken bones 	<ul style="list-style-type: none"> • Behavioural extremes (withdrawal, aggression or depression) • Unbelievable or inconsistent explanations of injuries • Fear of parents being contacted • Flinching when approached or touched • Truancy or running away from home

Emotional abuse

<ul style="list-style-type: none"> • Eating disorders, including obesity or anorexia • Speech disorders (stammering) • Nervous disorders (rashes, hives, facial tics, stomach aches) 	<ul style="list-style-type: none"> • Fear of parent being approached • Fear of making mistakes • Developmental delay in terms of emotional progress
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	<ul style="list-style-type: none"> • Cruel behaviour towards children, adults or animals • Self-harm • Behavioural extremes, such as overly compliant/demanding, withdrawn/aggressive, listless/excitable
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Sexual abuse

<ul style="list-style-type: none"> • Torn, stained or bloody underclothes • Pain or itching in genital area • Bruises or bleeding near genital area or anus • Sexually transmitted infections • Pregnancy • Discomfort when walking or sitting down 	<ul style="list-style-type: none"> • Self-harm • Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level • Sudden or unexplained changes in behaviour • Avoidance of undressing or wearing extra layers of clothing • Truancy • Regressive behaviours (bed-wetting or fear of dark)
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Neglect

<ul style="list-style-type: none"> • Height and weight significantly below age level • Body odour (lice, dirt etc) • Inappropriate clothing for weather conditions • Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) • Constant hunger, sometimes stealing food from others 	<ul style="list-style-type: none"> • Erratic attendance at school • Chronic hunger or tiredness • Having few friends • Assuming adult responsibilities
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Child Sexual Exploitation

<ul style="list-style-type: none"> • Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy 	<ul style="list-style-type: none"> • Sudden decline in school performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Deterioration in mental well-being • Mixing with older people • Misuse of drugs and alcohol
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Child criminal exploitation and county lines

<ul style="list-style-type: none"> • See sections on physical and sexual abuse • Carrying weapons • Have been the victim or perpetrator of serious violence (eg knife crime) • Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection • Found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters • Have their bank accounts used to facilitate drug dealing 	<ul style="list-style-type: none"> • Self-harming • Persistently going missing from School or home and/or being found out of area • Deterioration in mental well-being • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups • Significant decline in School performance • Gang association or isolation from peers or social networks • Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
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Female genital Mutilation

<ul style="list-style-type: none"> • Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C 	<ul style="list-style-type: none"> • Abroad for a prolonged period abnormal • Unusual behaviour after a period of absence • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations
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Forced marriage

<ul style="list-style-type: none"> • Cut or shaved hair as a form of punishment for being disobedient 	<ul style="list-style-type: none"> • Absence from School • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger
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Grooming

See section on sexual abuse	<ul style="list-style-type: none"> • Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • Going missing from home or School
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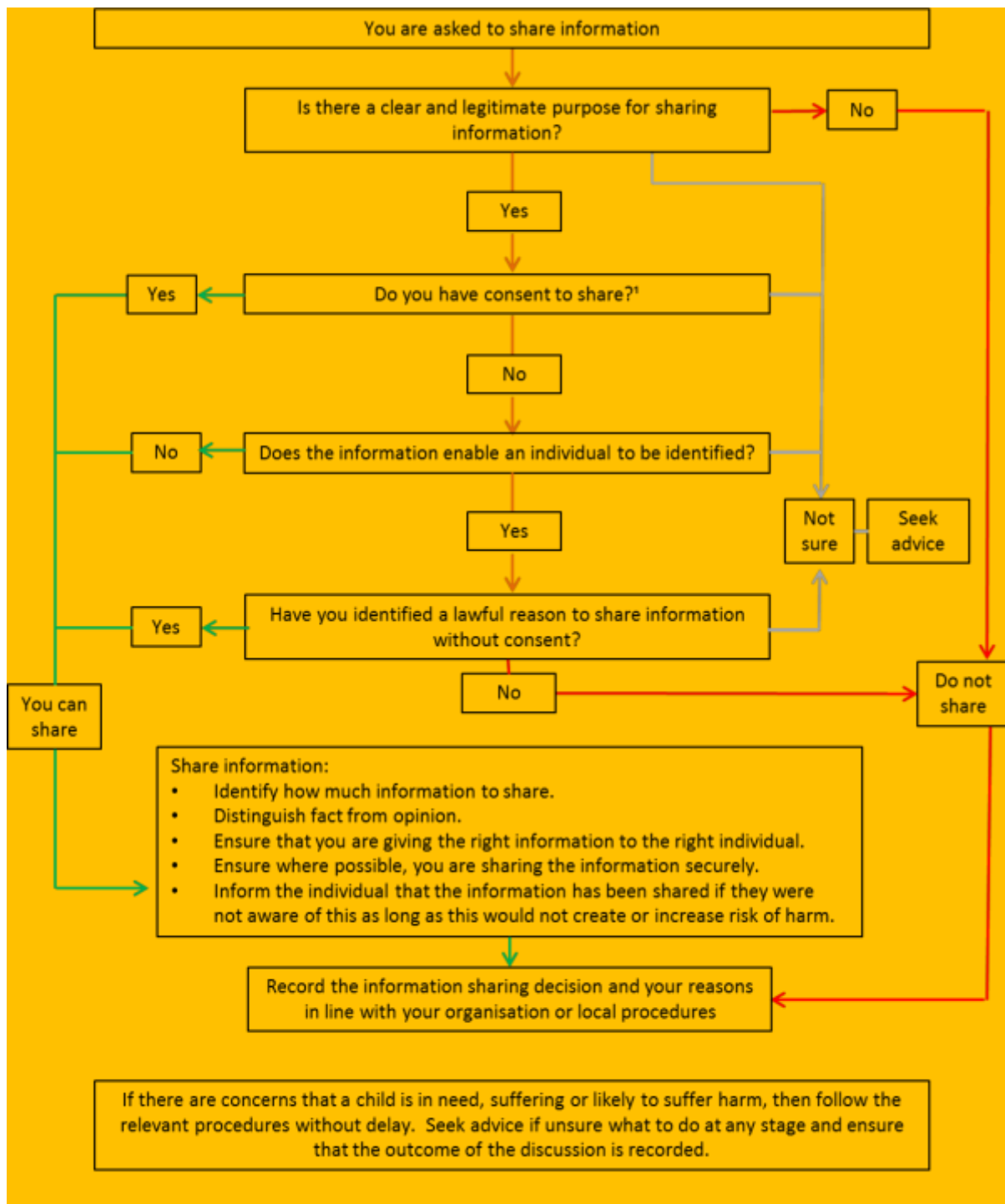
Radicalisation

<ul style="list-style-type: none"> • out of character changes in dress, behaviour, and peer relationships • Embracing conspiracy theories • Increasingly judgemental or argumentative • Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non- proscribed extremist groups such as the English Defence League 	<ul style="list-style-type: none"> • Showing sympathy for extremist causes • Glorifying violence • Evidence of possessing illegal or extremist literature • A sudden disrespectful attitude towards others • Unwilling to engage with or being abusive to pupils who are different • Increased secretiveness, especially in relation to internet use eg changing online identity or having more than one online identity • Unwillingness or inability to discuss their views • Feeling persecuted
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Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping Children Safe in Education September 2023)

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| <ul style="list-style-type: none"> • bullying, including cyberbullying • children missing education • child missing from home or care • child sexual exploitation • domestic violence • drugs • fabricated or induced illness • faith abuse • female genital mutilation (FGM) • gangs and youth violence | <ul style="list-style-type: none"> • gender-based violence/violence against women and girls (VAWG) • hate • mental health • missing children and adults • private fostering • preventing radicalisation • sexting • trafficking |
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Appendix 3: Flowchart of when and how to share information



Appendix 4: DSL Job Description

Job description for the Designated Safeguarding Lead (DSL)	
The Guardianship is committed to safeguarding and promoting the welfare of children and young people and expects all staff and host families to share this commitment	
Summary of the role	<ul style="list-style-type: none"> • To take lead responsibility for safeguarding and child protection (including online safety) occurring within the Guardianship or homestays and to support all other staff in dealing with any child welfare and child protection concerns that arise • To provide advice and support to other staff and homestays on matters of child welfare, safeguarding and child protection • To take part in strategy discussions and inter-agency meetings • To promote and safeguard the welfare of pupils in the Guardianship's care • The ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.
Main duties and responsibilities	Further specifics:
Availability	<p>The DSL is expected to:</p> <ul style="list-style-type: none"> • Ensure that you will always be available during the school terms and also holidays when pupils are staying with homestays to discuss any safeguarding concerns • arrange adequate and appropriate cover arrangements for any out of hours/out of term holidays taken
Managing referrals	<p>The DSL is expected to refer cases:</p> <ul style="list-style-type: none"> • of suspected abuse and neglect of any pupil within our care to the local authority children's social care and support staff who make referrals to local authority children's social care (and/or the appropriate school) • to the Channel programme where there is a radicalisation concern and support staff or host families who make referrals • where a person is dismissed or left due to risk/harm to a child or who has committed a crime – to report this to the Police
Working with others	<p>The DSL is expected to:</p> <ul style="list-style-type: none"> • act as a source of support, advice and expertise for all staff and homestays • act as a point of contact with the three safeguarding partners: the local authority (Bristol); the appropriate school's DSL and the police

	<ul style="list-style-type: none"> ensure that an 'appropriate adult' is present if a pupil is being questioned or detained by the police
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	<ul style="list-style-type: none"> as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff or host family member liaise with pupil's school and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances work with the relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced
Information sharing and managing the child protection files	<p>The DSL is expected to:</p> <ul style="list-style-type: none"> ensure that child protection files are kept up to date ensure that information is kept confidential and stored securely ensure that records include: <p><i>a clear and comprehensive summary of the concern</i> <i>details of how the concern was followed up and resolved</i> <i>and of any action taken, decisions reached and the outcome</i></p> <ul style="list-style-type: none"> ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KSCIE If it is considered necessary to share any safeguarding files with another guardianship organisation if the parents move to another, it is vital that a conversation of a private nature is had with the new guardianship company
Raising awareness	<p>You are expected to:</p>

	<ul style="list-style-type: none"> ensure each member of staff has access to, and understands, the Guardianship's safeguarding policy and procedures, especially new and part-time staff and homestay families ensure the Guardianship's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly ensure the safeguarding policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the Guardianship in this
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	<ul style="list-style-type: none"> • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements • 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 leadership staff.
Training, knowledge and skills	<p>You are expected to ensure your child protection training is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.</p> <p>In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:</p> <ul style="list-style-type: none"> • <i>understand the assessment process for providing early help and statutory intervention, including local criteria for action and local-authority local authority children's social care referral arrangements</i> • <i>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</i> • <i>understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;</i> • <i>understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes</i> • <i>understand the importance of information sharing, both within the Guardianship and with the safeguarding partners, other agencies, organisations and practitioners</i> • <i>understand and support the Guardianship with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation</i> • <i>are able to 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 in homestays</i> • <i>can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online</i>
	<ul style="list-style-type: none"> • <i>obtain access to resources and attend any relevant or refresher training courses</i> • <i>encourage a culture among all staff of listening to pupils and taking account of their wishes and feelings, in any measures the Guardianship may put in place to protect them</i>

Providing support to staff	<p>Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child-protection matters. This includes, specifically, to:</p> <ul style="list-style-type: none"> • <i>ensure that staff are supported during the referrals processes</i> • <i>support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support</i>
Understanding the views of children	<p>It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:</p> <ul style="list-style-type: none"> • <i>encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the Guardianship may put in place to protect them</i> • <i>understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication</i>
Holding and sharing information.	<p>The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team <i>should</i>:</p> <ul style="list-style-type: none"> • <i>understand the importance of information sharing, both within the Guardianship and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners</i> • <i>understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and</i> • <i>be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping</i>

APPENDIX 5 - SAFEGUARDING THE HOMESTAY

Welfare and Implementing Safeguarding Policies

Children under the care of Berkeley Guardians are encouraged to look after each other and to pass on concerns to our staff. Children are made aware of this through their first day induction, the Pupil Handbook and reminded through WhatsApp messaging service.

Berkeley Guardians staff members are in daily contact with each other through telephone and email to discuss concerns about individuals informally. More formal discussions about welfare and safeguarding take place at weekly meetings. Berkeley Guardians are also in regular contact with the individual schools for updates on the child's wellbeing.

Berkeley Guardians staff members who work in outreach (as area managers etc) will be known as Guardian Angels to those children they care for.

Host Family Allocation

Children of the opposite sex are not permitted to share a room and suitable safeguarding measures are put in place to ensure the child has sufficient privacy from other children within the home. The parent must also be made aware of this arrangement and give their consent and the only exception is if parents make a request for siblings to share a room.

Children of the same sex are permitted to share a room, but adequate measures should be in place to ensure their privacy and risk assess them sharing. Their parent must consent to this.

Children must have their own bed and not share with another child. Children must have access to a bathroom which has a locked door.

No more than 3 children from Berkeley Guardians or any other Guardian Agency can be placed in a host family at any one time unless in emergency circumstances.

Berkeley Guardians will ensure that as far as reasonably practicable that the Host Family will **not** host any other children from any non-AEGIS registered organisation or independent paying guests whilst they have one of our children staying with them.

Berkeley Guardians will ensure as far as reasonably practicable that when our children under the age of 16 are within the homestay, no young person over the age of 18 will be hosted either from any other Guardian Agency/organisation or independent person.

We accept the DBS online update facility and encourage our host families to take this on as it enables BG to check their DBS annually.

Accommodation

Host Family accommodation for U18s is managed by Berkeley Guardians. Detailed guidance on the following areas is given in other documents:

Health and safety checks on all new host families, including fire alarm/evacuation checks	Host Family Handbook Certificates required and are kept on file
Health and safety checks on existing host families, including annual fire risk assessments and gas safety checks	Host Family Handbook All host families are inspected annually to ensure the fire evacuation plan is appropriate, enforced and that all fire prevention is in working order.
Appropriate conduct for homestay families hosting U18s	Host Family Handbook Induction procedures

Safeguarding course for all homestay adults	This is taken online through Three Rivers (company run by Adam Lubbock (Chair of AEGIS))
Conduct and rules for U18 children	Parent/Carer Agreement on conduct and rules for U18 children, Pupil Handbook
Enhanced DBS and checks taken on all adults over 16 years living in the home	DBS is taken online and Berkeley Guardians does not hold the certificate
PREVENT guidance	PREVENT online course is a demand placed on all host families
Private Fostering regulations	Host Family Handbook <i>Whilst this is mentioned Berkeley Guardians do not become involved in this area and have never had a host in this position</i>
Unsupervised activities for U18s	Parental/Carer Agreement on conduct and rules for U18s, Pupil Handbook, parent/carers consent form for unsupervised activities

Private Fostering Arrangements

If a child under the age of 16 (under 18 if disabled) is cared for 28 days or more by someone who is not their parent or a close relative this is deemed a private fostering arrangement and Children's Social Care for the relevant area must be notified. If this is the case for a host family, Berkeley Guardians will liaise with them to ensure that Social Care is informed and that all necessary procedures are followed.

NB -this has never been required by Berkeley Guardians of any of our host families to date

Social Activities

To maintain a safe supervision ratio for social activities, we consider each activity and each group of children individually, taking into account the nature of the activity and the age, gender, language level and needs of the child, in line with the level of risk identified in the risk assessment. Whilst age-based guidelines can be helpful, the specific needs of each group are constantly assessed and considered.

For social activities, Berkeley Guardians observes the following ratios (this may be reduced depending on the format of the group):

- 1 adult for every 15-20 children aged 11 to 17
- 1 adult for every 10-15 children aged 8 to 10

Berkeley Guardians are aware that dangerous activities such as climbing may require more adults to supervise U18s safely and these are risk-assessed individually.

Only children aged 16+ are allowed to have unsupervised time on social programme events; younger children may have continual/partial adult supervision, depending on individual circumstances, which are evaluated in risk assessments. At the start of an outing, U18 children are made aware of key contact phone numbers they can use if necessary.

Unsupervised outings for u18s

U18s are not allowed to go on unsupervised outings outside the town/city of their host family without the permission of both Berkeley Guardians and parent/carer.

The procedure for obtaining permission is as follows:

- Parent/carer email the completed 'consent form for activities/trip' to Berkeley Guardians
- Berkeley Guardians carries out a risk assessment of the activity's suitability
- Berkeley Guardians advises the child, the host family and parent/carer about whether we think the activity is appropriate/safe

Transport

Berkeley Guardians requires all contracted transport companies to confirm in writing that their drivers are DBS checked and the company hold a copy of all transport companies' safeguarding policies etc. Any Berkeley Guardians staff drivers or host families are also DBS checked.

Berkeley Guardians ensures that any vehicle used for the purpose of transporting children is insured, taxed, regularly serviced and MOT checked.

Procedures for transporting children in staff and host family vehicles are detailed in the Parent and Host Family handbooks.

First Aid, Medical Conditions and Disabilities

All children/parents/carers are required to give Berkeley Guardians information about medical conditions and/or disabilities on the application form. This information is passed on to Berkeley Guardians Directors, who will draw up (where required) an appropriate care plan for the child with their parent/carer and, where appropriate, the family's own medical practitioners. This plan is agreed upon with the relevant host family, relevant staff and the child's parents/carer before the child's arrival.

Untrained Berkeley Guardians adults are not allowed to administer any prescribed medicine to any child without the prior agreement of parent/carer and, where necessary, medical professionals. Any prescribed medicines kept by Berkeley Guardians or Host Family for the child will be kept in a secure place. *Host Families are asked to take First Aid courses.*

Any child needing medical attention will be accompanied by a responsible Berkeley Guardians adult if required by the school or during the holidays with homestays.

First aid is available by Berkeley Guardians staff and host families. An accident book is also kept Berkeley Guardians online and will be completed where necessary and appropriate action taken. The DSL is currently first aid in the workplace trained.

APPENDIX 6 – Reporting a disclosure form

Safeguarding concern/allegation form (to be given to Berkeley Guardians' DSL)

Pupil's first name	
Pupil's family name	
Pupil's date of birth	
Pupil's age	
Pupil's nationality	
Individual pupil or group name:	
Full name of person with concern	
Role of person with concern	
Contact details of person with concern	
Date (and time) concern noted	
Location where concern noted	
<p>Concern (please provide as much detail as possible)</p> <p>N.B. If reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more if needed.</p>	
Pupil's views (if known)	
Suggested follow-up/advice to be given to pupil , if applicable	
Date and time form completed:	

Signature of person with concern:	
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Please see procedure in the policy document and complete if you have a safeguarding concern/allegation to report. You must complete the boxes in bold; the other information can be filed in by the School Designated Safeguarding Person later if you do not know.

APPENDIX 7 – Referring a Concern

Full name, role and contact details of person with concern	
Role of person with concern	
Date (and time) concern noted	
Location where concern noted	
<p>Concern (please provide as much detail as possible)</p> <p><i>N.B. If reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more if needed.</i></p>	
Pupil's views (if known)	
Suggested follow-up/advice to be given to	

pupil, if applicable	
Date DSM informed:	
Discussed with:	
Parents/group leader/agent/homestay/others informed?	

Response	By whom (full name)	When (Date & Time)

APPENDIX 8 – Reporting an alleged incident

First name	
Family name	
Date of birth	
Age	
Nationality	
Any disability?	
Role/connection with school	
Home address	
Parents' names (if under 18)	

Date and time of alleged incident	
Location of alleged incident	
Details of alleged incident (continue on continuation page where required)	
Names of potential witnesses and relationship to student	

requiring safeguarding	
Any other information?	
Allegation category (e.g. physical/sexual)	
Was technology involved? If yes, what type?	

Signed (by person submitting referral)	
Date & time (form submitted to DSL or Director)	

Verified Safeguarding Documents

Document Title	Source	Latest Update	Notes
Keeping Children Safe in Education (KCSIE)	GOV.UK	July 2025 (final version due Sept 2025)	Statutory guidance for schools and colleges. Includes updates on gender questioning children and online safety.
National Minimum Standards for Boarding Schools	GOV.UK	September 2022	Covers safeguarding, accommodation, staff vetting, and guardianship standards.
The Children Act 1989	Legislation.gov.uk	Continuously updated	Foundation legislation for child welfare, parental responsibility, and guardianship provisions.
Working Together to Safeguard Children	GOV.UK	December 2023	Strengthens multi-agency collaboration and introduces national child protection standards.

Additional Documents You Might Include

To further strengthen your safeguarding policy, consider referencing or incorporating:

- **Children and Families Act 2014** – Enhances support for children with special educational needs and disabilities.
- **Care Standards Act 2000** – Sets standards for care services including fostering and residential care.
- **Safeguarding Vulnerable Groups Act 2006** – Governs vetting and barring of individuals working with children.
- **Local Safeguarding Partnership Protocols** – Tailored procedures for your region or authority.
- **Prevent Duty Guidance** – Addresses safeguarding from radicalisation and extremism.