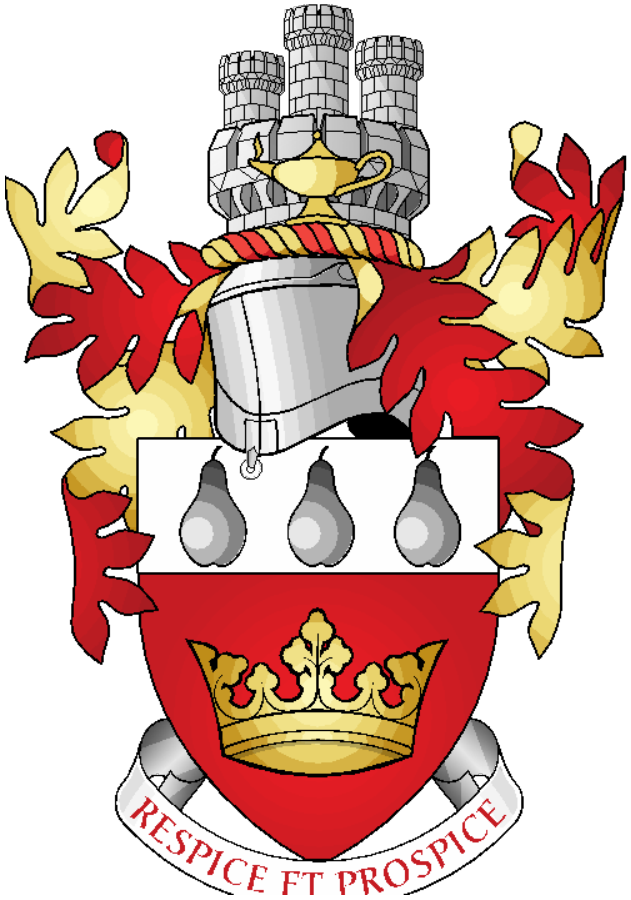

THE RGS WORCESTER FAMILY OF SCHOOLS

RGS Worcester | RGS Dodderhill | RGS The Grange | RGS Springfield

SAFEGUARDING AND CHILD PROTECTION POLICY

Strictly Aligned with Worcestershire County Council (WCC) Master Policy 2026, Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026 and the Independent School Standards (as amended April 2026)

ISI Code / Status:	ISI Code 7a - Safeguarding and Child Protection Policy
Effective From:	1 September 2026
Next Review Date:	31 August 2027
Governing Body Lead:	Antonia Noble (Governing Body Safeguarding Governor)
Executive Headmaster:	Mr John Pitt (Headmaster of RGS Worcester)
Director of Safeguarding:	Mrs Sofia Nicholls (Assistant Head Pastoral and Safeguarding, RGS Worcester)

This policy must be read and referenced in conjunction with the following separate policies:

- Anti-Bullying (2026)
- Missing Child Policy (2026)
- Mobile Phone Policy (2026)
- PSCHE Policy (2026)
- Pupil Absence from School (2026)
- Relationships Education Policy (September 2026)
- Rewards, Behaviour and Sanctions Policy (September 2026)
- Admissions and Attendance Register Policies and Procedures (September 2026)
- Artificial Intelligence Policy (September 2026)
- Child on Child Abuse Policy (September 2026)
- Children Missing Education Policy (September 2026)
- Images Policy (September 2026)
- Medical and First Aid Policy_ (September 2026)
- Online Safety and Acceptable Use …mart Devices Policy (September 2026)
- Safer Recruitment Policy (September 2026)
- SEND Policy (September 2026)
- Whistleblowing Policy (September 2026)

RGS WORCESTER FAMILY OF SCHOOLS SAFEGUARDING DIRECTORY

The following tables contain the details of the designated personnel responsible for safeguarding and child protection across all settings within the RGS Worcester Family of Schools (RGS Worcester, RGS Dodderhill, RGS The Grange, and RGS Springfield), as ratified by the Full Board of Governors in September 2026. Staff and visitors must contact the relevant Designated Safeguarding Lead (DSL) immediately if any concern arises.

Key Internal Safeguarding Personnel

Role / Setting	Name	Email Address	Telephone
Governing Body Safeguarding Governor	Antonia Noble	antonia.noble@rgsw.org.uk	01905 613391
Executive Headmaster & Head of RGS Worcester	Mr John Pitt	headmaster@rgsw.org.uk	01905 613391
RGS Worcester Assistant Head & Director of Safeguarding (DSL)	Mrs Sofia Nicholls	sn@rgsw.org.uk	01905 613391
RGS Worcester Deputy DSL	Mr Mark Evetts	mje@rgsw.org.uk	01905 613391
RGS Worcester Deputy DSL	Mrs Elizabeth Kilburn	ewk@rgsw.org.uk	01905 613391
RGS Worcester Deputy DSL	Mrs Angela Newport	ajn@rgsw.org.uk	01905 613391

RGS Dodderhill DSL & Deputy Head Pastoral	Mrs Caroline Vinson	cmv@rgsw.org.uk	01905 778290
RGS Dodderhill Deputy DSL & Headmistress	Mrs Amy Page	amp@rgsw.org.uk	01905 778290
RGS Dodderhill Deputy DSL	Mrs Amelia Cartwright	acc@rgsw.org.uk	01905 778290
RGS Dodderhill EYFS DSL	Mrs Hannah Fewtrell-Bolton	hcf@rgsw.org.uk	01905 778290
RGS The Grange DSL & Assistant Head (Pastoral)	Mr Thomas McCallion	tmc@rgsw.org.uk	01905 451205
RGS The Grange Deputy DSL & Headmaster	Mr Gareth Hughes	gwh@rgsw.org.uk	01905 451205
RGS The Grange Deputy DSL - Assistant Head Academic	Mrs Marie-Claire Egginton	me@rgsw.org.uk	01905 451205
RGS The Grange Deputy DSL	Mrs Katie Bradley	kmb@rgsw.org.uk	01905 451205
RGS The Grange Deputy DSL - Holiday Club	Miss Clare Mullins	cem@rgsw.org.uk	01905 451205
RGS The Grange Deputy DSL (IT & Digital)	Mr Matt Warne	mcw@rgsw.org.uk	01905 451205
RGS The Grange EYFS DSL & Deputy DSL	Mrs Phenice Fletcher	psf@rgsw.org.uk	01905 451205
RGS Springfield DSL	Miss Ashleigh Chalmers	ajc@rgsw.org.uk	01905 24999
RGS Springfield Deputy DSL & EYFS DSL	Mrs Camilla Williams	caw@rgsw.org.uk	01905 24999

Key External Safeguarding Contacts

Agency / Authority	Role / Detail	Contact Details
WCC Family Front Door (FFD)	Main Portal for Worcestershire Child Protection Referrals	01905 822666 (Core Hours) 01905 768020 (Out of Hours / EDT)
Local Authority Designated Officer (LADO)	Managing Allegations Against Staff / Positions of Trust	01905 846221 LADO@worcestershire.gov.uk
WCC Safeguarding in Education Adviser	Denise Hannibal (Education Safeguarding Lead)	01905 844436 dhannibal@worcestershire.gov.uk

West Mercia Police - Prevent Team	Prevent Single Point of Contact (SPOC) & Channel Lead: Jim Bayliss	01386 591835 prevent@westmercia.pnn.police.uk
National Helpline Services	Childline & NSPCC Whistleblowing Line	Childline: 0800 1111 (24 Hours) NSPCC Whistleblowing: 0800 028 0285

SECTION 1: KEY STATUTORY FRAMEWORK & SCOPE

This Safeguarding and Child Protection Policy reflects the mandatory legal duties, responsibilities, and statutory guidance that apply directly to the RGS Worcester Family of Schools. It has been developed in accordance with the principles established by the Children Act 1989, the Children Act 2004, the Children and Families Act 2014, Section 175 of the Education Act 2002, and the Education (Independent School Standards) Regulations 2014. It is fully aligned with the Department for Education's (DfE) statutory guidance Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the Children's Wellbeing and Schools Act 2026, the Domestic Abuse Act 2021, and the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015).

This policy governs all safeguarding practices across the entire RGS Worcester Family of Schools, which encompasses four distinct educational settings and their associated early years provisions: RGS Worcester (Senior School), RGS Dodderhill, RGS The Grange, and RGS Springfield. It applies universally to all members of the school community, including full-time and part-time staff, temporary and supply teachers, agency staff, contractors, governors, and volunteers. Safeguarding is the moral and statutory responsibility of everyone in our community, permeating all activities, academic departments, extracurricular provisions, holiday clubs, and operational functions.

SECTION 2: SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

2.1 The 'It Could Happen Here' Culture and Professional Curiosity

At the RGS Worcester Family of Schools, we enforce a culture of vigilant, child-centred safeguarding underpinned by the non-negotiable belief that **"it could happen here."** No member of staff should ever assume that safeguarding concerns are absent or that child-on-child risks do not exist within our settings. Everyone who comes into contact with our pupils has an active role to play in identifying concerns, sharing information, and taking prompt action in the best interests of the child. Staff must never assume that a colleague or another professional has already taken action. Staff are expected to exercise professional curiosity, looking beneath the surface of daily interactions, observing non-verbal or pre-verbal cues, and reporting any concern—no matter how small or seemingly insignificant—immediately to the safeguarding team, or to a member of SLT if a DSL or dDSL is unavailable. Additionally, staff should be reassured that raising their concerns to the relevant authorities is within their remit should a suitable senior member of staff or DSL not be available. Referral pathways are set out in Part One of KCSIE 2026 (actions where there are concerns about a child). Children have a right to expect vigilance, stability, respect, and action from the adults charged with their care.

2.2 Mandatory Staff Training & KCSIE 2026 Updates

In strict compliance with DfE regulations and KCSIE 2026, the previous provision allowing non-teaching, contracted, or support staff (such as groundskeepers, gardeners, caterers, and cleaning staff) to read only a summary or Annex has been completely abolished. All staff, governors, regular volunteers, and regular visitors are now statutorily required to receive comprehensive safeguarding induction and annual CPD updates, and must read Part One of Keeping Children Safe in Education 2026 in full. This ensures a unified, baseline level of knowledge regarding indicators of abuse, neglect, extra-familial harms, and reporting channels across the entire workforce. Additionally, all Governors, Heads, members of the Senior Leadership Team (SLT), Designated Safeguarding Leads, and Deputy DSLs are required to read Part Two of KCSIE 2026 regarding the management of safeguarding in education, along with other relevant sections applicable to their leadership roles.

2.3 Working Together 2026 Multi-Agency expectations

In accordance with Working Together to Safeguard Children 2026, we actively implement and adhere to the DfE's statutory expectations for multi-agency and multi-disciplinary safeguarding, which are structured at three distinct levels of practice:

- Strategic Leaders: Our Executive Headmaster and Governors collaborate to develop a shared safeguarding vision with local partners, evaluate what is working well through evidence, jointly allocate necessary resources, create an inclusive and anti-discriminatory culture, and engage in mutual professional challenge.
- Senior and Middle Managers (DSLs & SLT): Decisions are based on shared practice, constructive debate, and a multi-disciplinary approach. Managers ensure teams have dedicated time for peer learning, audit, group supervision, and direct observation, actively encouraging constructive challenge to avoid groupthink.
- Direct Practice (All Staff): Frontline practitioners share information proactively to get a complete picture of the child's life, putting the child's voice at the centre. Staff learn together, build strong relationships across disciplines, recognise the difference between acute family stress and parental abuse/neglect, and challenge assumptions in a restorative, respectful manner.

2.4 Identifying and Supporting Children Questioning Their Gender

RGS Worcester is committed to providing a safe, inclusive, and highly respectful environment for all pupils. In alignment with WCC guidance, we recognise that some children and young people may question their gender identity or gender expression. Our staff approach these situations with sensitivity, respect, and professional curiosity, taking time to understand each child's views, experiences, and circumstances. Consistent with national guidelines and the WCC policy, the school will not initiate discussions or actions relating to social transition. Any considerations or supportive measures in this area will always be managed on an individual basis in direct response to concerns, requests, or information shared by the child or their parent/carer, always prioritising the child's overall welfare, mental health, and educational outcomes. Staff must carefully consider any compounding vulnerabilities, such as emotional distress, peer isolation, bullying, or family relationship pressures, ensuring that supportive arrangements are fully customised to the child's developmental stage and individual needs. We seek to avoid unnecessary gender stereotyping while ensuring that safeguarding and welfare remain the primary considerations in all decision-making.

SECTION 3: OUR CORE SAFEGUARDING COMMITMENT

The RGS Worcester Family of Schools is committed to establishing and maintaining a safe, secure, and nurturing learning environment where children feel valued, respected, and heard. We are dedicated to delivering on the five main elements of our statutory commitment:

1. Safe Recruitment: Practising robust, safer recruitment checks to ensure the suitability of staff, Governors, and volunteers to work with children, including complete verification of identity, work history, references, and Enhanced DBS with barred list checks.
2. Preventative Education: Raising awareness of child protection issues and equipping pupils with the critical digital and offline resilience skills needed to keep themselves and their peers safe, delivered through regularly timetabled PSHCE, Tutorials, Assemblies, and external specialist workshops.
3. Standardised Procedures: Developing and implementing robust, unified procedures across all settings for identifying and reporting cases, or suspected cases, of abuse, neglect, and exploitation immediately on CPOMS.
4. Integrated Support & Early Help: Supporting pupils who have been identified as in need of Family Help or statutory intervention, collaborating proactively with Worcestershire Children First, West Mercia Police, and health services to deliver early help at the earliest possible stage.
5. Secure Environment: Establishing a safe, inclusive, and transparent environment where pupils know there are trusted adults they can approach, and ensuring that their wishes and feelings are sought, heard, and actively considered in all decisions affecting their welfare.

SECTION 4: CHILD-ON-CHILD ABUSE & DELEGATED SISTER POLICIES

4.1 Statement of Zero Tolerance

RGS Worcester operates a zero-tolerance whole school approach to all forms of child-on-child abuse, harassment, and violence. Child-on-child harm is treated with the same severity and subjected to the same rigorous child protection procedures as abuse perpetrated by an adult. All staff recognise that children are fully capable of abusing their peers physically, sexually, emotionally, and online. Behaviours such as sexual comments, physical intrusions, non-consensual image sharing, possessing or sharing sexual images of those under 18 – even with consent or online bullying must never be dismissed or downplayed as "banter," "just a laugh," "boys being boys," or "a normal part of growing up."

The Rewards, Sanctions, and Behaviour policies for each RGS setting, and the Exclusions Policy contains further information about sanctions and consequences related to child-on-child violence.

Dismissing these actions risks normalising unacceptable behaviour, creating an unsafe school environment, and silencing victims. Every incident will be challenged, recorded on CPOMS, and addressed immediately to prevent the normalisation of abusive cultures.

4.2 Operational Delegation to Sister Policies

To maintain a streamlined, compliant Safeguarding Policy, the extensive operational, frameworks for specific child-on-child risk areas are delegated to dedicated, stand-alone sister policies, which are

referenced and linked at the top of this policy. This policy establishes the core safeguarding principles, while operational execution must be read in conjunction with the following:

- Anti-Bullying Policy (September 2026): Governs the preventative strategies, reporting channels, investigation steps, and sanctioning levels for all forms of child on child bullying, including cyberbullying, prejudice-based bullying, and discriminatory bullying. It explicitly forbids the use of 'banter' to excuse abusive or harassing behavior.
- Child on Child Abuse Policy (September 2026): Sets out the detailed operational steps, risk assessment procedures, and safety planning for child-on-child sexual violence, sexual harassment, and harmful sexual behaviour (utilising the Hackett Continuum). This policy ensures a proportionate, child-centred response, providing robust, trauma-informed pastoral support to victims while implementing strictly monitored risk management plans for alleged perpetrators.
- Online Safety and Acceptable Use of Smart Devices Policy (September 2026): Establishes the behavioural boundaries, digital citizenship education, and acceptable usage rules for all pupils and staff accessing school devices, networks, and personal smart technology on school premises.

4.3 Digital Harms, Deepfakes & Generative AI

The RGS Worcester Family of Schools actively addresses the rapidly evolving landscape of online and digital harms, particularly those amplified by artificial intelligence. Our policy explicitly prohibits and mandates a swift safeguarding response to the creation, possession, or distribution of nude or semi-nude images, including AI-generated material, deepfakes, manipulated sexualised media, and "nudification" applications. Any incident involving AI-generated abuse, image-based coercion, digital exploitation, or AI-enabled sextortion will be treated as an acute child sexual abuse and safeguarding concern, not simply a behavioural infraction. The DSL will perform immediate risk assessments to evaluate the scale of exposure, consent, coercion, and potential distribution. Appropriate child protection referrals will be submitted to the Family Front Door and, where criminal acts are suspected, West Mercia Police, in strict accordance with the national guidelines for responding to youth-produced sexual imagery.

SECTION 5: EMOTIONAL HEALTH, WELLBEING & MENTAL HEALTH SUPPORT

5.1 Strategic Alignment & Statutory Duties

The RGS Worcester Family of Schools recognises that a pupil's emotional health and mental wellbeing are fundamental to their safety, development, and academic success. In accordance with Keeping Children Safe in Education (KCSIE) 2026, the DfE guidance 'Promoting and supporting mental health and wellbeing in schools and colleges' and the Children's Wellbeing and Schools Act 2026the school is committed to establishing a safe, inclusive, and preventative environment. We recognise that mental health problems can, in some cases, develop into or be a primary indicator of safeguarding concerns. This includes self-harm, suicidal ideation, eating disorders, severe anxiety, depression, and risk of suicide. Where a child's mental health issues are linked to abuse, neglect, exploitation, or trauma, staff must treat these as child protection matters and immediately activate our safeguarding procedures.

5.2 Integrated Support Infrastructure & Local Referrals

To ensure that pupils receive the right help at the right time, the RGS Worcester Family of Schools has established a comprehensive, multi-tiered mental health support and clinical intervention directory:

- **On-Site Clinical Support:** RGS Worcester operates a dedicated on-site Counselling Service staffed by two qualified, professional School Counsellors. RGS Dodderhill, RGS The Grange, and RGS Springfield each benefit from a dedicated on-site School Counsellor who works closely with the respective DSLs and pastoral teams to provide rapid, evidence-based individual therapeutic sessions.
- **Designated Senior Leadership:** Mrs Sofia Nicholls (Assistant Head Pastoral & Safeguarding) and Director of Safeguarding acts as the Designated Senior Mental Health Lead at RGS Worcester and across the RGS Worcester Family of Schools, coordinating with the mental health leads at each setting to oversee the strategic implementation of our Mental Health and Wellbeing Strategy.
- **Proactive Parent Partnership:** We work closely and transparently with parents and carers to support the whole family, unless doing so would place the child at additional risk of harm. At the conclusion of any mental health review, next steps are agreed, and a record is securely logged on the child's secure CPOMS file.
- **National & Local Clinical Referrals:** The school actively signposts and makes direct clinical referrals to:
    - **NHS 111 Online:** Accessible at *www.111.nhs.uk/* for urgent but non-emergency clinical guidance.
    - **Worcestershire CAMHS:** Accessible at *www.hacw.nhs.uk/camhs/* for statutory multi-agency clinical mental health services.
    - **Kooth:** Accessible at *www.kooth.com/* for free, safe, and anonymous online mental health support and counselling.
    - **NSPCC Whistleblowing Line:** Call 0800 028 0285 for alternative professional escalation.

5.3 Mandatory Procedures for Staff Concerns & Emergency Crisis Protocol

If a staff member identifies a mental health concern that also indicates a potential safeguarding or abuse risk, they must treat it as a child protection matter. Staff must immediately report the concern in person to the DSL or Deputy DSL and log the details on CPOMS within the hour. If a child is in immediate physical danger, has attempted self-harm, or is experiencing an acute suicidal crisis, staff must call 999 immediately or arrange for the child to be taken to the nearest A&E department by a parent, carer, or other suitable adult. The DSL must be notified immediately, or a dDSL in their absence. All mental health concerns, safeguarding discussions, and professional decisions—along with the specific reasons for those decisions—must be meticulously recorded in writing on the pupil's secure child protection file in CPOMS.

SECTION 6: OPPORTUNITIES TO TEACH SAFEGUARDING

RGS Worcester recognises that preventative education is one of the most effective tools to safeguard pupils. We integrate robust, evidence-based safeguarding instruction across our broad and balanced curriculum, specifically through regularly timetabled PSHCE lessons, Tutorials, Computing and IT modules, Assemblies, and external specialist workshops. The curriculum content is strictly matched

to the pupils' age, developmental stage, and cognitive capabilities, ensuring appropriate customisation for pupils with Special Educational Needs and Disabilities (SEND).

Our educational programme proactively addresses vital safety concepts, including: bullying and cyberbullying prevention; healthy relationships and personal boundaries; the concept and laws of sexual consent; online safety and digital resilience; road, fire, and water safety; addiction awareness (drugs, alcohol, and substance misuse); child-on-child abuse, sexual violence, and sexual harassment; serious youth violence and knife crime; county lines and criminal exploitation; Prevent and building resilience to radicalisation; and honour-based abuse issues. All curriculum delivery emphasises that the law is in place to protect and empower children, not to criminalise them, and provides clear, safe pathways for pupils to seek help for themselves or their peers.

SECTION 7: ONLINE SAFETY, FILTERING & MONITORING GOVERNANCE

7.1 The Four Areas of Online Risk (4Cs)

RGS Worcester structures its online safety arrangements around the recognised "4Cs" framework to mitigate digital hazards effectively:

- Content: preventing exposure to illegal, inappropriate, or harmful material (such as pornography, fake news, misogyny, self-harm, or extremist content).
- Contact: mitigating harmful online interactions, commercial grooming, or adult exploitation.
- Conduct: addressing personal online behaviour that causes harm, including cyberbullying, trolling, or image sharing.
- Commerce: safeguarding against online gambling, phishing, financial scams, or commercially aggressive advertising.

7.2 Filtering and Monitoring Standards

The Full Governing Body holds ultimate statutory responsibility for ensuring that RGS Worcester's IT infrastructure features highly effective filtering and monitoring systems that limit pupil exposure to online risks. To meet the Department for Education's digital standards, the school:

(1) assigns clear roles and responsibilities to manage and oversee the filtering and monitoring systems, with the Senior Deputy Head as the member of the Senior Leadership Team responsible for filtering and monitoring, the DSL taking lead responsibility for online safety, and the IT technical leads maintaining the systems day to day;
(2) conducts a rigorous annual review of filtering and monitoring provisions to ensure they remain aligned with evolving technology and local risk assessments;
(3) applies filtering and monitoring to every school-owned device, wherever it is used, and to any personal device connected to the school network, on all four sites, and blocks harmful and inappropriate content without unreasonably impacting teaching and learning; and
(4) maintains robust, active monitoring strategies that generate daily logs and alerts, which are reviewed by the DSL.

Governors receive formal, documented assurance regarding the implementation, stability, and effectiveness of these systems at least annually, and written records of all infrastructure reviews are retained for audit purposes. All staff receive training at induction and through regular updates to

ensure they understand their specific roles and responsibilities regarding online safety, filtering systems, and how to escalate technical or behavioural concerns immediately. The Safeguarding Governor, who holds responsibility for online safety, liaises regularly with the Director of Safeguarding, Senior Deputy Head and the IT departments to ensure that the school's online safety arrangements are robust, proportionate, and regularly updated to reflect the rapidly evolving nature of technology and online risks, including those arising from generative AI. The school will only use generative AI products that meet the DfE's Generative AI product safety expectations. Any use of generative AI by staff or pupils must be carefully considered and assessed under our Acceptable Use of AI Policy, evaluating benefits and safeguarding risks such as cognitive offloading, generation of deepfakes, AI-generated intimate imagery, and AI-enabled financial sextortion.

7.3 Mobile Phone Restrictions

Please also reference the separate Mobile Phone Policy

RGS Worcester settings maintain a strictly controlled mobile phone policy to minimise distractions, bullying, and online risks. By default, our schools operate mobile-phone-free environments during the school day. Pupils are prohibited from accessing their personal mobile phones or unapproved smart devices throughout the school day, including during lessons, the time between lessons, breaktimes, and lunchtime. Sixth Form pupils have more flexible arrangements reflecting their maturity and preparation for independent life. Sixth Formers must adhere to the following:

- Phones may be used only in Gordon House, and only before and after school, during morning and lunch breaks, and during study periods.

Any permitted use of personal technology represents a strictly authorised exception for academic or medical needs, supervised directly by a member of staff. To prevent bypass of the school's filtering and monitoring systems, pupils are prohibited from accessing the internet using personal 3G, 4G, or 5G cellular network connections or personal hotspots while on school premises. Any personal smart device permitted under strict academic or medical exceptions must connect exclusively through the school's filtered and monitored Wi-Fi network. In our early years and foundation stage (EYFS) settings, staff are strictly prohibited from utilising personal mobile phones, smart devices, or imaging devices within the childcare areas.

SECTION 8: EXTRA-FAMILIAL THREATS & TARGETED EXPLOITATION

8.1 Child Sexual Exploitation & Child Criminal Exploitation

RGS Worcester recognises that child criminal exploitation (CCE) and child sexual exploitation (CSE) are severe forms of abuse and extra-familial harm. Both involve perpetrators taking advantage of power imbalances to coerce, manipulate, or control children under the age of 18 into sexual or criminal activity. In strict accordance with WCC Policy guidelines, we view children involved in exploitation as victims first and foremost, and our staff actively work to prevent the adultification of older teenage pupils, ensuring their vulnerabilities are recognised and that they receive child protection support.

CCE commonly manifests in county lines activity, where criminal networks exploit children to transport and store illegal drugs and money, using coercion, weapons, and "debt bondage" to ensure compliance. Perpetrators frequently use tactics like "cuckooing" (taking over the home of a vulnerable individual) or digital recruiting via social media. Staff are trained to identify indicators of

CCE and CSE, including: unexplained acquisition of gifts, expensive possessions, or cash; significant changes in emotional wellbeing; frequent truancy or going missing; association with older or controlling individuals; or signs of physical trauma. The DSL will coordinate immediate referrals to WCC Family Front Door, complete local GET SAFE risk assessments, and share intelligence with West Mercia Police.

8.2 Serious Violence & Knife Crime

Serious youth violence is a critical child protection concern. RGS Worcester plays an active role in protecting pupils from violence, identifying risk factors, and working in partnership with local Violence Reduction Units (VRUs) if deemed necessary. We maintain a strictly enforced prohibition against the possession or carrying of weapons. Any concern that a pupil is carrying a weapon, has used a weapon, or has expressed a clear intention to do so must be reported immediately to the DSL, Senior Deputy Head or a Deputy DSL. The DSL will execute a rapid safety assessment, contact West Mercia Police, inform parents where safe to do so, and implement a robust safety and support plan. The school cooperates fully with specified local authorities in discharging the Serious Violence Duty under the Police, Crime, Sentencing and Courts Act 2022.

8.3 Children Missing from Education & Attendance (Working Together 2026 / Attendance July 2026)

Unexplained or persistent absence and missing education represent critical safeguarding warning signs that may indicate underlying risks, such as abuse, neglect, sexual or criminal exploitation, or forced marriage. In strict compliance with Working Together to improve school attendance (July 2026), RGS Worcester implements the following rigorous, legally compliant attendance-monitoring procedures:

- **Register Timing & Closing:** The attendance register is taken at the start of each morning and once during each afternoon session, at the same time for all registered pupils. The register is kept open for a maximum of 30 minutes, after which any late arrival must be recorded as absent (Code U or similar). In addition to the statutory attendance register, at RGS Worcester we take a register of pupils at the start of each lesson which is monitored closely by the Attendance secretary and the DSL, in order to safeguard all pupils but particularly those who are deemed as vulnerable.
- **First Day Calling & Unexplained Absences:** Staff will follow up unexplained absences on the first day. If a pupil who is subject to a child protection plan or assessed as vulnerable experiences an unexplained absence of more than two days, the DSL will immediately notify the child's social worker.
- **Emergency Contact Numbers:** To ensure robust emergency contact capabilities, the school holds a minimum of **two emergency contact numbers** for every registered pupil, giving additional options to establish contact with a responsible adult.
- **Deletions from Roll:** All deletions from our admission register at non-standard transition points are legally required to be notified directly to the Worcestershire County Council CME officer (Deletion Return) within 5 days, providing the child's next address, emergency contacts, and future school details.
- **Persistent & Severe Absence (below 50%):** Pupils missing 10% or more (persistent absence) receive targeted pastoral support. Pupils missing 50% or more (severe absence) represent our highest priority. Severe absence for unauthorised reasons is recognised as a critical safeguarding

and potential neglect issue; the school will, where appropriate, collaborate with the local authority to initiate a full children's social care assessment under s.17 or s.47.

- Leaves of Absence: Leaves of absence are strictly restricted to exceptional circumstances, requested in advance. Each application is considered on its individual merits, and the school does not operate blanket approval policies. Leisure or holidays are not deemed exceptional circumstances.
- Temporary Part-Time Timetables: Phased returns may only be used as a temporary, time-limited measure to meet medical or reintegration needs. They require the written agreement of both the school and parent, must have a clear reintegration plan with regular review dates, a proposed end date, and must never be used to manage behaviour.

8.4 Elective Home Education

Where a parent or carer expresses an intention to remove a child from school to pursue Elective Home Education (EHE), RGS Worcester will proactively coordinate a multi-disciplinary meeting with the parents, local authority professionals, and the DSL. This meeting aims to discuss the parent's plans, explore what is in the best interests of the child, and ensure that the parents have made a fully informed decision. This is of paramount importance if the child has Special Educational Needs and Disabilities (SEND), is highly vulnerable, or has an assigned social worker.

8.5 Homestay Exchange Visits

RGS Worcester implements strict safeguarding protocols for school-arranged homestay exchange visits. Where the school arranges for a visiting foreign pupil to be accommodated in the UK in the home of an RGS host family, the host adults are deemed to be engaged in regulated activity. The school, as the regulated activity provider, will obtain Enhanced DBS certificates with barred list information for all host parents and assess the suitability of the household. For homestays arranged abroad, the school liaises closely with partner settings to review local checks, uses its professional judgement to verify that the placements are safe, and provides pupils with clear, 24-hour emergency contact numbers to report any discomfort or concerns.

8.6 Violence Against Women & Girls (VAWG) & Honour-Based Abuse

RGS Worcester is fully alert to the dynamics of Violence Against Women and Girls (VAWG), honour-based abuse (HBA), female genital mutilation (FGM), breast ironing, and forced marriage. All forms of HBA are treated strictly as child protection issues and referred immediately to local statutory agencies. Under Section 5B of the Female Genital Mutilation Act 2003, there is an absolute, mandatory reporting duty placed on all teachers: if a teacher, in the course of their professional duties, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 (either through direct disclosure or visual evidence), they must personally report it to the police immediately. This reporting duty cannot be delegated, though the teacher should also inform and discuss the matter with the DSL. If a member of staff suspects that a pupil is at risk of FGM or any other faith-based violence, this should be referred to the DSL or dDSL without delay.

Furthermore, we recognise that forced marriage is a crime. Since February 2023, it has been a criminal offence to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, regardless of whether coercion, violence, or threats are used. This applies fully to non-binding, unofficial, or cultural marriages, as well as legally registered ceremonies.

8.7 Safeguarding in Physical Education and Sport

The School maintains a proactive risk-management stance for all physical education and sporting activities, ensuring supervision ratios and staff expertise are commensurate with the activity's risk profile. In accordance with KCSIE 2026 (paras 95-98), all external sports coaching contractors and specialist instructors are subject to the same rigorous 'safer recruitment' and vetting standards as permanent school staff. Direct oversight by school-appointed leads is mandatory during all off-site fixtures and transition periods. Staff are trained to ensure that any necessary physical assistance is provided with strict adherence to pupil dignity, ensuring such contact is transparent, age-appropriate, and essential for the safety or instruction of the activity.

In strict accordance with the sports exceptions in Part 6 of the Equality Act 2010 and the statutory requirements of KCSIE 2026, RGS Worcester may designate certain sports to be played in single-sex groups from specified ages where necessary to ensure pupil safety or competitive fairness. In these designated safety-critical sports, no exceptions will be made, and pupils must participate in the group corresponding to their biological sex. Where a gender-questioning pupil requests to participate in sports or physical activities designated for the opposite sex in non-safety-critical activities, the DSL will manage this request as a social transition support request under Section 2.4 of this policy, conducting a comprehensive risk and safety assessment to balance the child's wellbeing against the safety, fairness, and privacy of other pupils.

8.8 Safeguarding and School premises: Toilets, Changing rooms and Accommodation

RGS Worcester provides a safe physical environment that respects the privacy, comfort, and dignity of all pupils. In strict compliance with the School Premises Regulations 2012, the Independent School Standards, and KCSIE 2026, the school maintains absolute biological sex separation for all single-sex facilities:

1. Toilets: separate toilet facilities are provided for boys and girls aged 8 and over. No pupil is permitted to access a toilet facility designated for the opposite biological sex.
2. Changing Rooms and Showers: suitable separate changing accommodation and showers are provided for pupils aged 11 and over who receive physical education. No pupil is permitted to undress in front of a pupil of the opposite biological sex, nor access changing facilities designated for the opposite biological sex.
3. Overnight Accommodation: on all school-arranged residential trips, exchange visits, and boarding arrangements, pupils must not share overnight sleeping accommodation with a pupil of the opposite biological sex.

These boundaries carry no exceptions, including when the School is responding to a request to support a pupil's social transition. If a gender-questioning pupil does not wish to use the facilities designated for their biological sex (see Section 2.4), the DSL will, working with the pupil and their parents, arrange suitable alternative provision, such as self-contained, lockable individual toilet cubicles or private individual changing spaces, ensuring that such arrangements do not compromise the single-sex provision or the privacy and dignity of other pupils. Any such arrangement will be agreed with the pupil's parents, unless the DSL judges that involving them would put the pupil at risk of

significant harm, in which case the reasons will be recorded. Every decision, and the reasons for it, will be recorded on CPOMS and reviewed at least termly.

8.9 Restrictive Interventions and Use of Reasonable Force.
Staff may only use reasonable force, restraint or seclusion as set out in the Care and Control of Pupils Policy and the DfE guidance 'Restrictive interventions, including use of reasonable force, in schools' (April 2026). Force is never used as a punishment. Every use of seclusion or restraint, and every significant use of force, is recorded the same day and reported to parents in writing, as required by Independent School Standards paragraphs 16A and 32A. The DSL reviews these records each half term to identify patterns and any safeguarding concerns, and governors receive the data termly. Any allegation that a member of staff has used force inappropriately is managed under Section 11.2.

8.10 Pupils with Medical Conditions and Allergies.
Pupils with medical conditions, including allergies, can be more vulnerable to harm, and a failure to meet their medical needs can be a safeguarding and neglect concern. Each setting follows the Medical and First Aid Policy and the Allergy Safety Policy, which take account of the DfE guidance 'Allergy safety in schools' (July 2026). Individual healthcare plans are agreed with parents, adrenaline auto-injectors are kept unlocked and accessible, and staff report any concern that a child's medical needs are not being met at home to the DSL.

SECTION 9: DOMESTIC ABUSE & MULTI-AGENCY FRAMEWORKS

9.1 Statutory Recognition & Impact
RGS Worcester recognises that domestic abuse encompasses physical, emotional, psychological, sexual, financial, and coercive or controlling behaviour within families. Under Section 3 of the Domestic Abuse Act 2021, children are recognised as victims of domestic abuse in their own right if they see, hear, or experience the effects of domestic abuse. Children experiencing domestic abuse are severely impacted; it represents a significant Adverse Childhood Experience (ACE) that can lead to physical, emotional, and psychological trauma, negatively affecting attendance, behaviour, and academic progress. Staff must remain vigilant to these impacts and recognise that domestic abuse can manifest as partner-on-partner violence or child-to-parent/caregiver abuse.

9.2 Operation Encompass & Multi-Agency Risk Assessment (MARAC)
The school actively participates in Operation Encompass, a multi-agency partnership between police forces and educational settings. Under the statutory duty established by the Victims and Prisoners Act 2024 and Section 49A of the Domestic Abuse Act 2021, police forces must notify the school's Key Adult (the DSL) before 9:00 AM on the next school day if officers have attended a domestic abuse incident where a registered pupil was present, resided, or was connected. This immediate, confidential notification ensures that our pastoral team can provide immediate, silent support (such as academic adjustments, emotional reassurance, or a safe space) to make the child's day better.
We participate in Operation Encompass Early Years in our nursery settings. Operation Encompass notifications do not replace statutory child protection referrals; if the DSL believes a child is at risk of significant harm, they will immediately refer the case to the WCC Family Front Door. For high-risk

domestic abuse cases, the DSL will collaborate with multi-agency partners and actively contribute to the Multi-Agency Risk Assessment Conference (MARAC) safety planning process.

SECTION 10: SAFEGUARDING PUPILS AT RISK OF EXTREMISM

In accordance with Section 26 of the Counter-Terrorism and Security Act 2015, the RGS Worcester Family of Schools is subject to the "Prevent duty" and is required to have due regard to the need to prevent people from being drawn into terrorism or supporting extremist ideologies. We recognise that radicalisation is a safeguarding issue and that exposure to extremist views, prejudiced narratives, or terrorist recruitment can lead to highly damaging educational and behavioural outcomes. We utilise the statutory definitions of Extremism (vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect); Radicalisation (the process of legitimising support for or use of terrorist violence); and Terrorism (actions designed to cause serious violence, damage, or electronic disruption to advance a political, religious, or ideological cause).

Staff are trained to recognise behavioural indicators of concern, such as a pupil accessing extremist materials online, isolating themselves from standard peer groups, expressing derogatory narratives, or justifying violence. All concerns must be referred immediately to the DSL, who serves as the school's Prevent Single Point of Contact (SPOC). The DSL will execute a Prevent risk assessment, discuss borderline cases with the local Prevent Lead, and, where there is a concern that a pupil may be susceptible to radicalisation, make a referral to the police using the Prevent national referral form, in line with the DfE Prevent guidance for DSLs (September 2026). The police assess each referral and decide whether it goes to the multi-agency Channel panel. To prevent the dissemination of extremist views, RGS Worcester performs strict due diligence checks on all visiting speakers and external organisations utilising our school facilities, ensuring they are vetted and supervised at all times.

All visiting speakers must show original current photographic identification (such as a passport or photo card driving licence) upon arrival at reception. The school conducts a written risk assessment before any visiting speaker is approved, maintains a formal register of visiting speakers retained in line with data protection guidelines, and requires speakers to sign an agreement that their presentation will actively promote and not undermine fundamental British values.

SECTION 11: PROFESSIONAL CONDUCT, ALLEGATIONS & LOW-LEVEL CONCERNS

Please also refer to our separate policies on Staff Code of Conduct, Whistleblowing and Low-level concerns.

11.1 Whistleblowing and Confidential Reporting

RGS Worcester maintains an open, honest, and accountable professional culture. We recognise that children cannot be expected to raise concerns in an environment where adult staff fail to do so. All staff and volunteers have an absolute duty to raise concerns about poor practice, behavioural failures, or potential safeguarding omissions by colleagues. Whistleblowing concerns should be referred directly to the Headmaster, Mr John Pitt, or the Chair of Governors if the concern relates to a Head. If any staff member feels unable to raise a concern internally, or believes their concern has

not been addressed, they are encouraged to contact the NSPCC Whistleblowing Advice Line (0800 028 0285; help@nspcc.org.uk).

11.2 Managing Allegations That Meet the Harm Threshold

Procedural frameworks for managing allegations against staff, supply and agency staff, volunteers, contractors, trainee teachers, governors, and individuals or organisations using the school premises follow strict statutory guidelines (KCSIE 2026, Part Four). This framework is activated when an adult working in a school is alleged to have: (1) behaved in a way that has harmed a child or may have harmed a child; (2) possibly committed a criminal offence against or related to a child; (3) behaved towards a child in a way that indicates they may pose a risk of harm if they work regularly or closely with children; or (4) behaved in a way that indicates they may not be suitable to work with children. Suspension must never be an automatic response when an allegation is reported. If suspension is deemed necessary, the Case Manager will formally record a written rationale and justification for the suspension, detailing exactly what alternative arrangements (such as internal redeployment, classroom assistance, or class transfers) were considered and why they were rejected. Active LADO cases must be reviewed at fortnightly or monthly intervals, with the first formal review occurring no later than four weeks after the initial assessment. As a registered charity, RGS Worcester will make a Serious Incident Report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Any such allegation must be reported immediately to the Head of the respective setting and Executive Headmaster Mr John Pitt (or the Chair of Governors if the allegation is against Mr John Pitt). The Case Manager is the Head of the relevant setting, or the Chair of Governors where the allegation concerns the Executive Headmaster. The DSL advises the Case Manager but does not manage the case. The Case Manager must contact the WCC Local Authority Designated Officer (LADO) within one working day of the allegation coming to light, prior to conducting any internal investigation or contacting the member of staff or parents. The LADO and, where necessary, West Mercia Police will coordinate a joint response. RGS Worcester will prioritise the safety of pupils, cooperate fully with multi-agency partners, and observe legal requirements to protect the anonymity of the accused member of staff during the investigative stage. If an employee is dismissed or resigns due to safeguarding risks and the statutory criteria are met, the school holds a legal duty to submit a referral to the Disclosure and Barring Service (DBS) and consider referral to the Teaching Regulation Agency (TRA) as soon as possible and in any event within one month where the criteria are met. For supply and agency staff, the school leads, informing the agency and the LADO and agreeing next steps with the agency. Allegations about individuals or organisations hiring the premises are reported to the LADO in the same way. In the EYFS settings, the school notifies Ofsted of any allegation of serious harm or abuse by any person working or looking after children on the premises as soon as reasonably practicable and within 14 days, with the action taken.

11.3 Managing Low-Level Concerns

A low-level concern refers to any concern—no matter how small, and even if causing only a "nagging doubt" or sense of unease—that an adult working in or on behalf of the school may have behaved in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, but does not meet the harm threshold set out above. Examples of such behaviour include being over-friendly with children, having favourites, engaging with a child on an unsupervised one-to-

one basis behind closed doors, or using humiliating language. All low-level concerns must be reported and recorded in accordance with our separate Low Level Concerns Policy. This allows the school to identify problematic patterns early, provide corrective guidance, and maintain the highest standards of professional boundaries.

SECTION 12: SAFER RECRUITMENT & SINGLE CENTRAL RECORD

Creating a safe environment begins with robust, safer recruitment practices. RGS Worcester adheres strictly to the statutory pre-employment checks outlined in KCSIE 2026. We ensure that: (1) all job advertisements and candidate packs contain our explicit safeguarding commitment; (2) at least one member of every recruitment panel has completed certified Safer Recruitment Training; (3) all applicants complete a comprehensive application form, with CVs only accepted as supplementary material; (4) professional references are requested and scrutinised prior to interview, with all discrepancies discussed; and (5) we carry out structured online searches for all shortlisted candidates as part of our due diligence to identify any publicly available concerns.

Successful candidates are subject to comprehensive vetting, including identity verification, right to work checks, Enhanced DBS checks with Children's Barred List information, qualifications checks, and teacher prohibition checks using the DfE 'Check a teacher's record' service.
. In line with KCSIE 2026, right to work documents are retained on the personnel file and will be destroyed exactly two years following the date they leave our employment. All completed checks are meticulously recorded on our centralised Single Central Record (SCR), which is maintained by the HR management team and audited regularly by the Safeguarding Governor. We apply consistent, risk-assessed vetting standards to all volunteers, peripatetic staff, IT technicians, and contractors, ensuring that no individual engages in regulated activity until all required checks are complete.

In accordance with the Crime and Policing Act 2026, RGS Worcester classifies any volunteer who teaches, trains, instructs, or supervises children on more than 3 days in a 30-day period (known as the statutory 'period condition'), or overnight, as engaging in regulated activity. Consequently, all such regular or overnight volunteers are statutorily required to undergo an Enhanced DBS check with Children's Barred List information prior to commencing their placement, regardless of the level of staff supervision provided.

SECTION 13: CONFIDENTIALITY & RECORD KEEPING

Information sharing is vital to safeguard children, promote their welfare, and improve their educational outcomes. RGS Worcester recognises that data protection legislation, including the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, is not a barrier to sharing information. Since 30 September 2026, section 4 of the Children's Wellbeing and Schools Act 2026 places a duty on the school to share information with safeguarding partners and relevant agencies where this is needed to safeguard and promote the welfare of children. The data protection regulator is now the Information Commission (formerly the ICO). Fears about sharing information must never be allowed to stand in the way of the need to safeguard and promote the welfare of children. Staff are instructed that they can never promise total confidentiality to a child disclosing

abuse; they must explain sensitively that they hold a responsibility to refer the concern to the DSL for the child's safety.

All safeguarding concerns, disclosures, and multi-agency actions are recorded in writing immediately (within the hour, where possible) on our secure, password-protected electronic safeguarding system, CPOMS. Safeguarding files are stored completely separately from standard academic pupil files, with a secure marker on the pupil main file indicating the existence of confidential material. When a pupil transfers to a new setting, the DSL will securely transfer their child protection record, including a summary, to the receiving school within standard timeframes (5 days), ensuring that a signed receipt of transfer is obtained and retained until the child's 25th birthday.

SECTION 14: EARLY YEARS FOUNDATION STAGE (EYFS) PROVISIONS

Our Early Years and Foundation stage (EYFS) provisions at RGS Springfield, RGS The Grange, and RGS Dodderhill operate in strict compliance with the safeguarding and welfare requirements of the EYFS Statutory Framework. We ensure that our early years environments are safe, secure, and arranged so that children can be seen and heard at all times. A named member of our senior safeguarding team holds direct responsibility for the early years setting, and a qualified Paediatric First Aid provider is on-site and available at all times. Staff working within the EYFS are strictly prohibited from using personal mobile phones, personal smart devices including watches and smart glasses, or personal cameras within the early years setting. Any imaging of pupils must be performed solely on school-owned iPads or devices, and saved in line with our Images Policy. Early years practitioners receive regular structured supervision meetings with their line managers and Nursery senior leaders, providing dedicated opportunities to review individual pupil vulnerabilities, share staff anxieties, and discuss ongoing Family Help plans. However, staff are encouraged to share their concerns as they arise.

Detailed directions regarding use of mobile phones and electronic devices with imaging and sharing capabilities within the EYFS setting at RGS The Grange, RGS Springfield and RGS Dodderhill can be found in their respective Electronic devices with imaging and sharing capabilities are in the Staff Handbook which must be read by all staff working at all these Schools.

Please also see specific policies for Nappy Changing and Intimate Care, Toileting and Nappy Changing Policy, Safe Sleep Policy, Supervision of children and Babysitting.

SECTION 15: SAFEGUARDING TEAM & GOVERNANCE RESPONSIBILITIES

15.1 Governing Body Strategic Responsibilities

The RGS Worcester Governing Body, is supported by a designated Safeguarding Governor with responsibilities for Allergy Safety and Online Safety providing board-level strategic oversight of filtering, monitoring, cyber security, the safe use of generative AI, and digital safeguarding incidents. The Governing Body holds strategic responsibility for ensuring that our safeguarding arrangements are legally compliant, highly effective, and properly resourced. The Governing Body will comply with each requirement provided by KCSiE 2026 and : (1) review and ratify this policy at least annually; (2) ensure that the Director of Safeguarding and the respective DSLs have sufficient time, funding, and

resources to execute their roles, explicitly accounting for the strategic complexity of their dual-site and nursery responsibilities; (3) maintain oversight of the Single Central Record; (4) audit the school's filtering and monitoring systems; and (5) complete the annual WCC s175/157 safeguarding audit, ensuring any identified deficiencies are remedied without delay.

15.2 Designated Safeguarding Lead Operational Responsibilities

The Designated Safeguarding Lead at each setting—Mrs Sofia Nicholls at RGS Worcester, Mrs Caroline Vinson at RGS Dodderhill, Mr Thomas McCallion at RGS The Grange, and Miss Ashleigh Chalmers at RGS Springfield—holds direct operational responsibility for coordinating safeguarding, managing referrals, and promoting the educational outcomes of vulnerable pupils (including Looked After Children and children with social workers). The DSLs will: ensure that a DSL or Deputy DSL is physically available on-site during school hours and has coordinated robust duty coverage for all holiday clubs, extracurricular activities, and educational visits**;** lead multi-agency coordination with WCC Family Front Door, West Mercia Police, and local health services; represent the school at strategy meetings, core groups, and Child in Need reviews; keep accurate child protection files; and deliver robust safeguarding briefings to keep all staff updated on local contextual risks. The full responsibilities for DSLs are outlined in Annex B of KCSiE 2026.

Outside school hours and in the holidays, a DSL or Deputy DSL is on call on a published rota held by Director of Safeguarding. Staff, parents and agencies can reach the safeguarding team through the the School number which comes through to the duty line.. If no DSL can be reached and a child is at immediate risk, staff contact the WCC Family Front Door (out of hours 01905 768020) or call 999.

SECTION 16: STATUTORY & NON-STATUTORY REFERENCES

Statutory Legislation & Guidance:

- Children Act 1989 (Sections 17, 20, 22, 31, 44, 46, 47)
- Children Act 2004 (Section 10, 11, 16)
- Education Act 2002 (Section 175)
- Education (Independent School Standards) Regulations 2014
- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- Children's Wellbeing and Schools Act 2026 (section 4 – information sharing)
- Counter-Terrorism and Security Act 2015 (Section 26 - Prevent Duty)
- Domestic Abuse Act 2021 (Section 3)
- Victims and Prisoners Act 2024 (Section 20 - Statutory Operation Encompass)
- Female Genital Mutilation Act 2003 (Section 5B - Mandatory Reporting Duty)
- Modern Slavery Act 2015 (Section 52)
- Homelessness Reduction Act 2017 & Temporary Accommodation Notification Duty
- Special Educational Needs and Disability (SEND) Code of Practice 0 to 25 years

Departmental Advice & Resources:

- DfE: What to do if you're worried a child is being abused: Advice for practitioners
- DfE: Sharing nudes and semi-nudes: Advice for education settings working with children (2024)
- DfE: Searching, screening and confiscation in schools (2024)
- DfE: Working together to improve school attendance (July 2026)

- UK Council for Internet Safety (UKCIS): Education for a connected world
- National Cyber Security Centre (NCSC): Cyber security standards for schools
- NSPCC: Understanding sexualised behaviour in children (Hackett Continuum)
- Home Office: Serious Violence Strategy & Criminal exploitation (County Lines)

Sponsor – Designated Safeguarding Lead

Reviewed and re-written by the Director of Safeguarding in accordance with KCSIE 2026, Working Together to Safeguard children 2026, and reviewed by the DSL team at each of the four settings and endorsed by the Governor with Safeguarding responsibility, 1 September 2026, October 2026

APPENDIX 1: CHILD-ON-CHILD ABUSE OPERATIONAL PROCEDURES

1. Purpose & Core Operational Standards

This appendix provides the essential operational frameworks for staff when responding to, managing, and recording child-on-child abuse. RGS Worcester enforces an absolute, zero-tolerance stance: child-on-child abuse is a severe child protection concern and will never be dismissed as banter or a normal rite of passage. Staff must always maintain the attitude that "it could happen here" and take all reports with the utmost seriousness. The safety, physical protection, and emotional wellbeing of the victim are our immediate priorities.

2. The Hackett Continuum of Sexualised Behaviour

To support professional safeguarding judgements and ensure proportionate, evidence-based interventions, the school utilises the NSPCC Hackett Continuum to categorise and evaluate sexualised behaviour among children:

- Normal Behaviour: Developmentally expected, consensual, mutual, and exploratory sexual curiosity occurring between children of a similar age and developmental stage. This behaviour is addressed through age-appropriate education, standard supervision, and pastoral support within the curriculum.
- Inappropriate Behaviour: Behaviour that falls outside standard developmental expectations but is generally isolated, lacking coercion, intimidation, or significant power imbalances. This is managed through clear behavioural boundaries, targeted education, and restorative conversations.
- Problematic Behaviour: Developmentally concerning, repetitive behaviour characterised by an emerging power imbalance or causing visible distress to others. The DSL must be notified immediately, a formal safeguarding assessment initiated, and pastoral monitoring put in place.
- Abusive Behaviour: Highly intrusive, non-consensual behaviour characterised by force, threats, exploitation, coercion, or severe power imbalances. This constitutes an acute child protection concern and requires an immediate referral by the DSL to local children's social care and, where criminal acts are suspected, the police.

3. Sharing Nudes and Semi-Nudes, Image-Based Abuse & AI-Generated Imagery

RGS Worcester implements a strict child-centred response to incidents involving the sharing of nude or semi-nude images (youth-produced sexual imagery). Staff must never: (1) print, copy, save, or forward any explicit image; (2) view the image on personal devices; or (3) ask a child to show, download, or share the image. All concerns must be reported immediately to the DSL. In compliance with 2026 digital standards, this framework applies fully to all AI-generated intimate media, deepfakes, manipulated sexualised content, and AI-enabled sextortion. These incidents will be treated with the same high level of concern and standard child protection procedures as actual physical imagery, with the DSL assessing ongoing risks, consent, and potential distribution to secure appropriate multi-agency support.

4. Safety Planning, Risk Assessments & Pupil Support

When an incident of child-on-child abuse is reported, the DSL will immediately initiate a comprehensive, separate risk assessment for all pupils involved (both the victim and the alleged perpetrator). RGS Worcester will implement a robust safety and support plan to manage risks on-site. This includes: evaluating transport arrangements to and from school; reviewing class lists and scheduling to determine if the victim and alleged perpetrator should share classes, breaktimes, or social spaces; and identifying named, trusted adults the pupils can speak to at any time. Victims will receive immediate, confidential pastoral support and access to our on-site School Counsellors, ensuring they are reassured, kept safe, and never made to feel ashamed or that they have created a problem by reporting abuse.

APPENDIX 2: RECOGNISING & RESPONDING TO ABUSE AND NEGLECT

1. Core Expected Actions During a Child's Disclosure

If a child makes a direct disclosure of abuse, neglect, or exploitation to any member of staff, volunteer, or contractor, they must follow the strict operational protocols outlined below to ensure a safe, supportive, and legally compliant response:

Required Actions (DO):

✓ Remain calm, listen attentively, and allow the child to speak at their own pace.

✓ Reassure the child that they have done the right thing by telling you, and take their report seriously.

✓ Explain clearly and gently that you cannot promise total confidentiality; you must share this information with the DSL or setting DSL who can help keep them safe.

✓ Ask only open-ended questions to clarify (e.g., "Could you tell me what happened?", "Can you explain what you mean when you say...?", "Can you describe the place?").

✓ Record the child's disclosure immediately (within the hour, if possible) using their exact words in quotation marks, noting the date, time, and location factually, and submit it on CPOMS.

Prohibited Actions (DO NOT):

✗ Do NOT ask leading or suggestive questions which may suggest what happened or who perpetrated the abuse (e.g., "Did your Dad hit you?").

✗ Do NOT begin an investigation yourself—never ask the child to record what happened in writing or attempt to gather evidence.

✗ Do NOT inspect the child's body or take photographs of any injuries. Staff must only observe parts of the body normally visible (hands, arms, face).

✗ Do NOT make promises of secrecy or tell the child you can keep this a secret.

✗ Do NOT express shock, anger, disbelief, or pass judgement regarding the disclosure, the victim, or the alleged perpetrator.

2. Overview of the Four Main Categories of Abuse

Staff must maintain professional curiosity and be alert to the specific physical and behavioral indicators of the four main categories of abuse:

- **Physical Abuse:** Unexplained bruises, burns, fractures, or bite marks. Behavioral indicators include a child being flinched or anxious when approached, wearing long clothing in hot weather to hide injuries, or being reluctant to change for sports.
- **Emotional Abuse:** Speech development delays, low self-esteem, extreme withdrawal, or severe behavioral outbursts. Emotional abuse can manifest in situations where a child is subjected to constant criticism, humiliation, or domestic abuse in the household.
- **Sexual Abuse:** Developmentally inappropriate sexual knowledge or behavior, running away from home, self-harm, or substance abuse. Physical indicators can include physical pain or discomfort when sitting, or indicators of sexualised infections.
- **Neglect:** Persistent hunger, poor hygiene, unwashed or ill-fitting clothing, or lack of medical care. Neglect can manifest in severe school attendance issues, constant exhaustion, or a child being left to take on inappropriate caring responsibilities. Young carers are a vulnerable group in their own right: being a young carer is not in itself a sign of neglect, but staff should pass any concern about a young carer to the DSL so that early help can be considered.