

SkWky — Safeguarding Policy

Version: 1.1 **Date:** 29 May 2026 **Owner:** Jai Twyman, SkWky Safeguarding Contact
Review: at least annually, and on any material change to the Service

This policy is written for **England** (referencing Keeping Children Safe in Education). Its guiding principle is that **SkWky is a software tool, not a mediation service**. The commissioning **School holds the statutory safeguarding duty**, provides the **Designated Safeguarding Lead (DSL)**, and **decides how the tool is used** (including whether sessions are supervised in person or completed remotely). SkWky is responsible for the tool and its built-in safety features working as described, and for escalating any concern that reaches SkWky directly — not for supervising pupils or for how a School deploys the tool.

1. Purpose and commitment

SkWky provides an AI-assisted mediation tool used by children aged 13–17 in schools. Because children may, during a mediation, write things that indicate harm, SkWky is committed to building safety into the tool and to supporting the schools that use it. This policy sets out how the Service handles concerning content, what SkWky is and is not responsible for, and how this fits with the safeguarding responsibilities of schools.

SkWky's commitment: the welfare of the child is paramount; we build safety features into the tool; and we support, and defer to, the safeguarding systems of the schools that use it.

2. Scope

This policy applies to SkWky personnel and to the operation of the Service. It sits alongside — and does not override — each **School's own safeguarding and child-protection policy**, which governs how concerns are responded to in practice.

3. Legal and statutory framework

This policy is informed by the framework for safeguarding children in England, including: Keeping Children Safe in Education (current edition); Working Together to Safeguard Children; and the Children Acts 1989 and 2004. Information sharing for safeguarding purposes is supported by the Data Protection Act 2018 and UK GDPR, which permit the sharing of personal data — including special category data — where necessary to protect a child (relying on conditions such as safeguarding of children, vital interests, or legal obligation, as applicable).

4. Roles and responsibilities

The School is the controller of pupil data and holds the statutory safeguarding duty. It provides a trained **Designated Safeguarding Lead (DSL)**, maintains its own

safeguarding policy and procedures, **decides how the Service is deployed** (including whether sessions are supervised), **monitors for the reports and alerts the Service sends**, and is responsible for responding to safeguarding concerns, including making referrals to children's social care, the police or other agencies.

The Administrator/teacher (authorised by the School) creates sessions, distributes access tokens, receives the reports and safety alerts the Service generates, and — where the School chooses a supervised deployment — may supervise sessions. Acting on a report or alert is done in line with the School's procedures.

SkWky's Safeguarding Contact (Jai Twyman) is responsible for SkWky's side of this policy: maintaining the tool's safety features, handling any concern that reaches SkWky directly, liaising with the School, and keeping this policy under review. SkWky is currently operated by a sole individual; the operational Designated Safeguarding Lead function remains with the School.

5. How the tool handles concerning content

The live conversation is guided by the automated mediator; **there is no SkWky human involved during a session**. Safety is built into the tool itself:

- The Service **monitors for certain categories of concerning content** — such as indications of self-harm, hate speech, abusive language or threats.
- Where such content is detected, the Service **ends the session immediately and sends the report to the School/teacher straight away**, so the School can act through its own safeguarding procedures.

Honest limitations. This is a safety feature, **not a guarantee**:

- Automated detection is **not perfect**. It may miss content that is phrased obliquely, and it may stop a session over content that turns out not to be a concern. It must not be relied on as the sole means of identifying risk.
- "Sent immediately" means the alert reaches the School's systems immediately — **whether it is seen immediately depends on the School**. Outside the times School staff are available (for example evenings, weekends or holidays), the **School's own safeguarding and emergency procedures are the backstop**, and Participants are signposted to independent support (clause 11).
- When a session is stopped, the child is at a difficult moment; the Service points the child towards help (a trusted adult and Childline) at that point.

6. The School's deployment decision

Because the tool can be used in different ways, **the School decides how to deploy it safely** — for example, conducting sessions in a supervised room where a teacher is present, or allowing Participants to complete them remotely, depending on the nature of the conflict and the needs of the Participants. This decision rests with the School as the body that knows the children and holds the safeguarding duty. SkWky does not require or assume any particular mode of deployment.

7. What a safeguarding concern looks like

Concerns that may arise include indications of: abuse or neglect (physical, emotional, sexual, or neglect); self-harm or thoughts of suicide; risk of harm to another person; bullying, including online; exploitation or grooming; domestic abuse; or any situation suggesting a child is at risk or in distress beyond the conflict being mediated. This list is not exhaustive. It is **not** for SkWky to investigate or reach conclusions; that is for the School's DSL and the relevant agencies.

8. Confidentiality and information sharing

Mediation conversations are treated as confidential. **However, confidentiality is not absolute, and the safety of a child comes first.** Where the tool detects a safeguarding concern, the relevant information (the report) is shared with the School so it can protect the child. Information is shared on a need-to-know basis, proportionate to the concern. This limit on confidentiality is communicated to Participants in age-appropriate language (clause 11 and the Participant Terms).

9. If a concern reaches SkWky directly

If SkWky (rather than the tool's automated mechanism) becomes aware of a concern — for example through a support query or its own review — SkWky's Safeguarding Contact will, without undue delay, notify the School so the School can act, and will provide the relevant information securely. SkWky will not attempt to investigate or contact the child.

10. Concerns about an adult

If a concern arises about the conduct of an Administrator or another adult connected to a session, it will be escalated to the School and handled under the School's procedures for allegations against adults (which may involve the Local Authority Designated Officer). SkWky will cooperate and will take appropriate steps regarding access to the Service.

11. Communicating with children

Children using the Service are told, in plain and age-appropriate language (in the Participant Terms shown before a session), that what they share is private **but** that if they say something suggesting they or someone else may be at risk, the conversation will stop and a report will be sent to their teacher straight away so they can get help. Children are encouraged to speak to a teacher or trusted adult, and are signposted to independent support (clause 13).

12. Records

Concerns surfaced through the Service (the reports), and any actions SkWky takes, are recorded factually, promptly and securely, and shared with the relevant School. Records are kept confidential and shared only with those who need them.

[Retention of safeguarding records to be confirmed on legal advice; safeguarding records may require longer retention than ordinary session data, and retention follows the School's requirements as controller.]

13. Review and contacts

This policy is reviewed at least annually, and whenever the Service or the relevant statutory framework changes materially. The Safeguarding Contact will complete recognised basic safeguarding awareness training.

- **SkWky Safeguarding Contact:** Jai Twyman, jai@skwky.com, 07747 463424.
- **Operational lead for any concern:** the commissioning School's Designated Safeguarding Lead, under the School's own procedures.
- **In an emergency, where a child is at immediate risk:** emergency services, 999.
- **Independent support:** Childline (0800 1111) for children and young people; the NSPCC helpline (0808 800 5000) for adults worried about a child.