Kent Catholic Schools' Partnership
'Academies in Christ'
Part of the Archdiocese of Southwark

Knowledge-rich, skills-led learning for all
Christ at our heart
Serving everyone in our community
Partnership of love, ambition, joy and peace

St Gregory's CATHOLIC SCHOOL

Child Protection & Safeguarding

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What to do if you have a concern

Why are you concerned?

For example:

- something a child has said, such as an allegation, disclosure or comment that causes concern
- changes in appearance, presentation, behaviour, emotional wellbeing or attendance
- unexplained injuries, marks or bruises
- witnessed or reported concerning, harmful or inappropriate behaviour, including online
- concerns linked to family circumstances, peer relationships or wider community context

Act immediately and record your concerns: If urgent, speak to a DSL first

Follow the procedures in the policy:

- Reassure the child and listen carefully; do not promise confidentiality
- Use open questions if needed, for example, **TED**: **T**ell, **E**xplain, **D**escribe
- Record facts and not opinions, using the child's own words where possible
- Sign and date your record and report to the DSL: seek support for yourself as required

Inform the Designated Safeguarding Lead(s) [See front sheet of policy for details]

- If a child is at risk of immediate harm, is unsafe to go home, or requires urgent protection, make an urgent Request for Support to the Front Door Service via the Kent Children's Portal and/or call the Police on 999.
- If there is no immediate risk of harm, consider what support is needed in line with the Kent Support Level Guidance and KSCMP procedures. This may include internal support, signposting to community based early help services, contacting the Police, reporting allegations against staff to the LADO, or making a Request for Support to the Front Door Service via the Kent Children's Portal.
- If the school believes a child may need support but is unclear whether a Request for Support is required, advice can be sought through a consultation from the Front Door Service via **03000 411 111**
- If support is required out of working hours, contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response:

DSLs/Staff:

- Follow whistleblowing procedures (see school website)
- Follow Kent safeguarding partnership escalation procedures.

Pupils or Parents:

- Follow school and Trust complaints procedures (see school website).

Record decision making and action taken in the pupil's file on CPOMS

Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor for
- Where, how and to whom you will feedback, and how you will record

Review and **request further support** if necessary.

At all stages, the child's circumstances will be kept under review
The DSL/staff will request further support if required to ensure the **child's safety** is **paramount**

1. Child Focused Approach to Safeguarding

1.1 Introduction

The Kent Catholic Schools' Partnership ("the Trust") recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is **everybody's responsibility** and everyone has a role to play in keeping children safe. This includes staff, volunteers, Trust directors, governance committee members, leaders, parents/carers, wider family networks and pupils.

The Trust believes that the best interests of children always come first. All children, defined in law and in this policy as anyone under the age of 18, have a right to be heard, protected and supported. This policy applies to all children, including those living with birth parents or extended family, children in kinship care, adopted children, looked after children, previously looked after children and care leavers. Where safeguarding concerns relate to pregnancy, staff will also consider the help, support and protection needs of unborn children.

All children have equal rights to protection, regardless of age, sex, ability, culture, race, language, religion, belief, sexual orientation or identity. The Trust is committed to creating and maintaining an inclusive, anti-discriminatory safeguarding culture. Staff are expected to recognise and challenge racism, discrimination and prejudice, and to consider how these experiences may affect children's safety, welfare and access to support.

Staff in the Trust will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child. If any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

This policy applies to child protection concerns relating to children who attend Trust schools. It may also apply to other children connected to the Trust community, such as siblings, children on student or work placements, or members of staff who are under the age of 18.

The Trust recognises the importance of providing a Catholic ethos and environment where children are safe and feel safe. Children will be respected, listened to and encouraged to talk openly. Their wishes and feelings will be taken into account when deciding what safeguarding action to take and what support to provide.

The Trust recognises that children's behaviour, presentation and experiences should be understood in context. Staff will take a trauma-informed and child-centred approach, considering the possible root causes of behaviour and the impact of abuse, neglect, exploitation, discrimination, adversity and wider contextual or extra-familial harm.

Our core safeguarding principles are:

- **Prevention:** providing a positive, supportive and safe culture, curriculum and pastoral opportunities for children, alongside safer recruitment procedures.
- **Protection:** following agreed procedures and ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns
- **Support:** adopting a child-centred approach and providing appropriate support for pupils, parents/carers and staff, including specific interventions for those who may be at risk of harm.
- **Collaboration:** working with parents/carers, where safe and appropriate, and with other agencies to ensure timely, proportionate and effective safeguarding action is taken.

The procedures contained in this policy apply to all staff, including local governance committee members, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2026.

1.2 Policy context

This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education 'Keeping Children Safe in Education' (KCSIE), which requires individual schools to have an effective child protection policy.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children (WTSC) 2026
- Early Years and Foundation Stage Framework (EYFS) 2026
- Ofsted: Education Inspection Framework 2026
- Framework for the Assessment of Children in Need and their Families, 2000
- Kent and Medway Safeguarding Children Procedures
- The Education Act 2002
- Education and Inspections Act 2006
- The Education (Independent School Standards) Regulations 2014
- The Non-Maintained Special Schools (England) Regulations 2015
- The Human Rights Act 1988
- The Equality Act 2010 (including the Public Sector Equality Duty)
- Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025 – referred to collectively as 'data protection laws'

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have regard to any guidance issued by the Secretary of State.

The Trust will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

1.3 Definition of safeguarding

In line with 'Working Together to Safeguard Children' and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and promoting the welfare of children. It refers to the activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

The Trust understands that significant harm is the threshold used to determine when statutory child protection intervention may be required. Under the Children Act 1989, "Harm" is the "ill treatment or the impairment of the health or development of the child". Harm can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child". There are no absolute criteria for determining significant harm. Significant harm may arise from a single serious incident or from a pattern of acute, longstanding, chronic or cumulative concerns which impair a child's health or development.

The Trust recognises that safeguarding concerns are rarely isolated. Children may experience multiple and overlapping harms, including abuse, neglect, exploitation, online harms and extra-familial harm. Our safeguarding response will consider the full context of a child's lived experience, including their relationships, family circumstances, peer groups, community, online activity and wider environment. Safeguarding includes a wide range of issues including, but not limited to:

- abuse and neglect
- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- child-on-child abuse
- children absent from education, missing from education, home or care
- children with family members in prison or affected by parental offending
- contextual safeguarding and extra-familial harm
- domestic abuse
- drugs and alcohol misuse
- exploitation, including child sexual exploitation and child criminal exploitation, group-based exploitation, county lines, gangs, serious violence, trafficking and modern slavery
- fabricated or induced illness
- gender-based abuse and violence against women and girls
- hate, discrimination and harmful prejudice
- homelessness
- honour or faith-based abuse, including Female Genital Mutilation and forced marriage
- mental health concerns
- online abuse and technology-assisted harm, including making or sharing nudes or semi-nudes
- preventing radicalisation and extremism
- private fostering
- sexual violence, sexual harassment, harmful sexual behaviour and relationship abuse

Further information about specific safeguarding issues can be found in Part one and Annex A of Keeping Children Safe in Education.

1.4 Related safeguarding policies

This policy is one of a series in the Trust integrated safeguarding portfolio and should be read and actioned in conjunction with the policies listed below:

- Acceptable Use of Technology Policies (AUP)
- Attendance
- Behaviour, including behaviour management and anti-bullying
- Complaints
- Data protection
- Emergency procedures, such as evacuations and lockdowns
- Health and safety
- First aid and accidents, including medication and managing illness, safer eating and allergies, health and safety, and infection
- Managing allegations against staff (within this policy)
- Mobile phones and smart devices
- Use of Generative Artificial Intelligence (AI)
- Personal and intimate care
- Relationship, Sex and Health Education (RSHE)
- Risk assessments, such as school trips, use of technology
- Safer recruitment
- Staff code of conduct
- Use of restrictive intervention
- Whistleblowing

Supporting Guidance to be read and followed alongside this document

- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - Safer Recruitment Consortium
- What to do if you are worried a child is being abused
- Early Years Foundation Stage (EYFS) Statutory Framework: The Safeguarding and Welfare Requirements

These documents can be found in / at: staff room, shared area of network, intranet, safeguarding training.

1.5 Policy compliance, monitoring and review

The Trust will review this policy at least annually and update it as needed, so that it remains current and reflects safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be updated following relevant national or local guidance changes, significant safeguarding events or learning, and any changes to Trust procedures.

All staff, including temporary staff, agency staff and volunteers, will be provided with access to this policy and Part one of the current version of Keeping Children Safe in Education. Staff will be expected to read and understand the relevant information as part of induction and ongoing safeguarding training. These documents can be accessed: Online, the staff room, school intranet, school website.

The Trust, working with the senior leadership team and DSL, will ensure mechanisms are in place to support all staff to understand and discharge their safeguarding roles and responsibilities as set out in Part one of KCSIE.

Parents/carers can obtain a copy of this Child Protection Policy and other related policies on request. These policies can also be viewed via the school website: St Gregory's Catholic School - Policies

The policy and wider safeguarding arrangements will be reviewed annually by the Trust Board who have responsibility for oversight of safeguarding and child protection systems across the Trust.

The Headteacher will provide regular reports to the local governance committee on safeguarding activity, systems and themes. Reports will support effective oversight and challenge but will not include details that identify individual pupils or families, unless this is required for a specific safeguarding purpose and is lawful and appropriate.

2 Key Responsibilities

2.1 All staff

Everyone who comes into contact with children and their families has a role to play in keeping children safe. The role of every individual at the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

All staff have an important role in safeguarding and promoting the welfare of children. They are well placed to observe changes in a child's behaviour, appearance, attendance or wellbeing, identify concerns early, provide help for children and prevent concerns from escalating.

All staff have a responsibility to:

- raise concerns without delay with the Designated Safeguarding Lead (DSL) or Deputy DSL where they believe a child may be in need of extra help or is suffering, or likely to suffer, significant harm
- provide a safe environment in which children can learn

- reassure children who report concerns that they are being taken seriously and will be supported and kept safe
- act in line with the Trust Code of Conduct, this Child Protection & Safeguarding Policy, and other relevant safeguarding policies.

All staff will:

- be aware of indicators of abuse, neglect and exploitation, including specific issues such as CCE, CSE, FGM, radicalisation, serious violence and online abuse.
- recognise that safeguarding incidents can occur outside school and/or between children outside the school environment, and that multiple safeguarding issues often overlap.
- understand that children may not disclose abuse and maintain professional curiosity, speaking to the DSL where they have concerns.
- be aware of the role and identity of the DSL and deputy/deputies, the school behaviour policy, the online safety policy, and the safeguarding response to children missing from education.
- be aware that mental health problems can, in some cases, be an indicator of abuse, neglect or exploitation.

All staff will:

- be aware of the Early Help process, the local offer and their role in identifying emerging needs and liaising with the DSL
- understand local referral pathways, including Requests for Support to children's social care and statutory assessments under the Children Act 1989
- know what to do if a child discloses abuse, including maintaining appropriate confidentiality while liaising with relevant professionals
- read and understand KCSIE Part 1 and Annex A annually and sign the Trust declaration each academic year.

Staff recognise that children may not feel ready, or know how, to tell someone they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. This will not prevent staff from maintaining professional curiosity and raising concerns with the DSL.

Staff will determine how best to build trusted relationships with children and parents/carers to support communication and early identification of needs, in line with the Trust Code of Conduct and the school behaviour policy.

2.2 Governance and leadership

The **Trust Board and Executive team** have strategic responsibility for the Trust's safeguarding arrangements and will ensure they comply with their duties under legislation and Keeping Children Safe in Education.

The **Headteacher** will ensure there is a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development, and that all systems, processes and policies operate with the best interests of the child at their heart.

The **Headteacher** and **leadership team** will ensure appropriate policies and procedures are in place so that timely action is taken to safeguard and promote children's welfare and will ensure that these policies and procedures are understood and followed by all staff.

The **Trust and school leadership** will have regard to their obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).

- This includes but is not limited to safeguarding all members of the school community, including staff, pupils, parents/carers and other family members, who are identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

- For further information about our approaches to equality, diversity, and inclusion, please access the Trust and school website.

The **Trust and school leadership** will promote an inclusive, anti-discriminatory safeguarding culture and ensure staff are supported to identify, understand and challenge racism, discrimination and disproportionality in safeguarding practice.

The **Trust Executive and Headteacher** will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of Designated Safeguarding Lead (DSL). They will ensure the DSL and any deputies have the appropriate status, authority, time, funding, training, resources and support to carry out the role effectively.

The Trust has a nominated **Board Director for safeguarding**. This person will provide appropriate oversight and challenge, including whether Trust safeguarding policies are effective, interlink with other relevant policies and are reviewed at least annually and updated when required.

The school has a nominated **local governance committee member** with responsibility for safeguarding. This person will provide appropriate oversight and challenge, including whether school safeguarding policies are effective, interlink with other relevant policies, reflect local procedures and are reviewed at least annually and updated when required.

2.3 Designated Safeguarding Leads (DSLs)

The school has appointed a member of the senior leadership team to act as **Lead Designated Safeguarding Lead (Lead DSL)**, please see front page of this policy for contact details.

The **Lead DSL** has overall responsibility for the day-to-day oversight of safeguarding and child protection, including online safety and the school's filtering and monitoring systems.

Deputy DSLs are appointed and trained to the same standard as the Lead DSL. They may carry out delegated activities; however**,** ultimate lead responsibility remains with the Lead DSL.

The **Lead DSL** is the person most likely to have a complete safeguarding picture and is the most appropriate person to advise staff on the response to safeguarding concerns.

All DSLs will carry out their role in line with Annex B of KCSIE, including:

- managing referrals to the Front Door Service, police, Channel, DBS and other agencies
- working with others including senior leaders, social workers, Early Help, Family Help, local authority services and safeguarding partners
- acting as a source of support, advice and expertise for all staff
- coordinating safeguarding action for individual children, including those with SEND, a social worker, receiving early help, looked after or previously looked after, or subject to child protection or child in need plans
- ensuring multi-agency contribution and appropriate representation at safeguarding meetings
- promoting educational outcomes by sharing relevant welfare and safeguarding information with teachers and leaders
- keeping the headteacher informed of safeguarding issues, including section 47 enquiries and police investigations
- ensuring child protection files are up to date, stored securely and transferred appropriately
- ensuring staff understand the requirement for an Appropriate Adult when a child is in contact with police officers
- communicating known vulnerabilities to police officers and record this on CPOMS
- escalating concerns under PACE by contacting a supervisor or calling 101 if needed.

The **Lead DSL** will:

- maintain CPOMS as the school's electronic safeguarding recording system.
- ensure CPOMS records include concerns, discussions, decisions and rationales, including where referrals were or were not made
- understand and monitor filtering and monitoring systems at least annually and escalate concerns
- ensure staff receive online safety training
- respond appropriately to online safety concerns
- make immediate and ongoing assessments of risk
- ensure staff understand the lawful basis for information sharing under Article 6 UK GDPR
- monitor safeguarding of pupils educated off site
- produce safeguarding data and information for governance committees, including the annual report to the Trust Lead Safeguarding Director/Officer.

Availability and cover arrangements

During term time, a DSL will be available during school hours for staff to discuss safeguarding concerns. This is achieved through:

- Emailing safeguarding@stgregorys.org.uk - Mr Cumber (Lead DSL) will receive all communications, as will Miss Lavender (Deputy DSL) and the wider DSL team.

Where a DSL is not available, safeguarding concerns can be raised, received, monitored and acted upon without delay through:

- Emailing safeguarding@stgregorys.org.uk - Mr Cumber (Lead DSL) will receive all communications, as will Miss Lavender (Deputy DSL) and the wider DSL team.

The school will ensure appropriate DSL cover during closures, out-of-hours activities and out-of-term activities.

- Emailing safeguarding@stgregorys.org.uk - Mr Cumber (Lead DSL) will receive all communications, as will Miss Lavender (Deputy DSL) and the wider DSL team.

Training and supervision

Lead DSLs will:

- Undertake local authority led DSL training every two years
- Receive annual knowledge and skills refreshers
- Attend Trust DSL seminars, Trust-led training, briefings and DSL supervision.

Deputy DSLs will:

- Undertake refresher training every two years via The Key
- Receive annual knowledge and skills refreshers.

New DSLs will:

- Undertake local authority led DSL training prior to commencing DSL duties.

2.4 Children

Children have a right to:

- feel safe, be listened to, and have their wishes and feelings taken into account.
- be taken seriously when they raise concerns about abuse, neglect, exploitation or any other safeguarding issue.
- receive appropriate help and support from safe adults.
- safely express their views, share concerns and give feedback about safeguarding arrangements.
- contribute to the development of school safeguarding policies.
- learn how to keep themselves and others safe, including online.

2.5 Parents and carers

Parents/carers have an important role in safeguarding and promoting the welfare of their children. They are encouraged to work in partnership with the school and to:

- understand and follow relevant policies and procedures.
- talk to their children about safeguarding, including online safety, and support the school in their safeguarding approach.
- identify behaviours or changes which may indicate that their child, or another child, may be at risk of harm, including online.
- speak to the school if they have concerns about their child, or another child's, welfare or wellbeing.
- seek advice or support from the school or other agencies if they have concerns about their child, or another child's, safety or wellbeing.

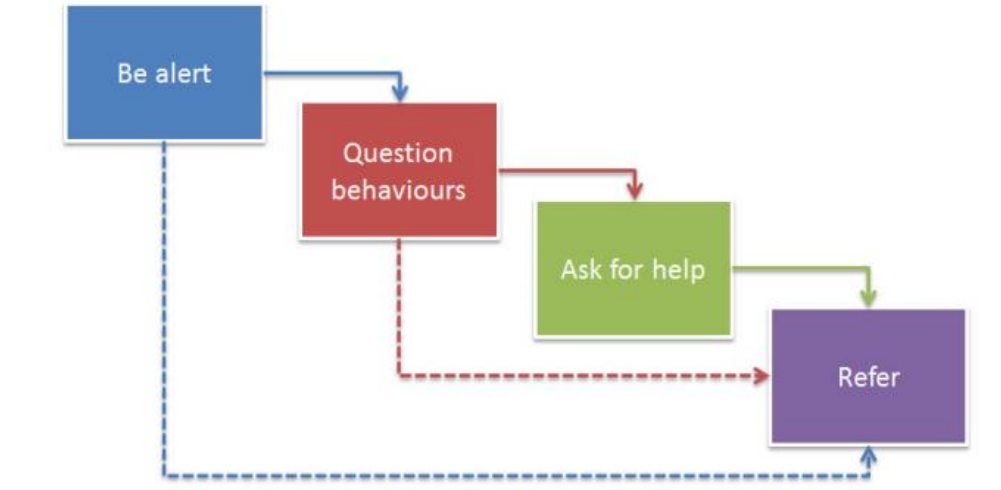
3 Child Protection Procedures

3.1 Recognising indicators of abuse, neglect and exploitation

Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified in 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. Staff will also be expected to understand these indicators in line with the Kent Support Levels Guidance.

All members of staff are expected to be aware of and follow the 'What to do if you are worried a child is being abused' guidance if they are concerned about a child:



The Trust recognises that when assessing whether a child is suffering, may be suffering, or is likely to suffer, harm, there are four categories of abuse (further information is included in appendix 1):

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

By understanding the indicators of abuse, neglect and exploitation, we can identify children who may need help or protection, respond as early as possible, and help ensure children and families receive the right support.

The Trust recognises that concerns may arise in many different contexts and can vary in nature and seriousness. Indicators of abuse, neglect and exploitation do not automatically mean that a child is being harmed; however, all concerns will be taken seriously and explored by the DSL on a case-by-case basis.

The Trust recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label. In many cases, multiple issues will overlap.

All staff will consider whether children may be at risk of abuse, neglect, exploitation or harm in situations outside their families. The Trust recognises that extra-familial harms can take a variety of forms and that children may be vulnerable to multiple harms, including sexual abuse, sexual harassment and exploitation, domestic abuse within their own intimate relationships, criminal exploitation including financial exploitation, serious youth violence, county lines, online harms and radicalisation. Staff will report any concerns to the DSL in line with this policy, and the DSL will consider the wider context of the child's experiences when assessing risk and support needs.

The Trust recognises that any child may benefit from support before statutory intervention is required. This may include support from universal services, community-based Early Help, or the targeted early help level of Family Help. Further information about how the Trust responds to safeguarding and welfare concerns, including requests for support, is set out in section 3.2 of this policy.

All staff will be alert to the potential need for additional support for children who may be more vulnerable or whose circumstances may indicate emerging, escalating or unmet needs. Staff will be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs, whether or not they have a statutory Education, Health and Care plan
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, association with organised crime groups or county lines
- is frequently missing or goes missing from education, home or care
- electively home educated
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, is attending alternative provision or is attending a Pupil Referral Unit
- is at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing alcohol or other drugs themselves
- is at risk of honour or faith-based abuse, such as Female Genital Mutilation or Forced Marriage
- is privately fostered.

Where staff identify that a child may benefit from additional support, they will report their concerns to the DSL in line with this policy.

Staff will be alert to:

- concerns raised by children, including disclosures or comments about themselves, their peers or family members
- changes in a child's behaviour, appearance, attendance, presentation or emotional wellbeing.
- indicators of abuse, neglect or exploitation
- concerning interactions between children and parents/carers
- parental behaviours which may indicate risk, including concerns linked to substance misuse, mental health, domestic abuse or other family circumstances
- risks outside the family home, including peer groups, the wider community and online context
- the needs of children with additional or complex needs, who may require additional support or specialist services.

Children may not feel ready or know how to tell someone they are being abused, neglected or exploited. They may also not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns.

All reports and concerns raised by children will be taken seriously and responded to in line with this policy. Staff will reassure children that they are being taken seriously, that they will be supported and kept safe, and that they will not be made to feel ashamed or that they are creating a problem by reporting concerns.

The Trust recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

Following a concern about a child's safety or welfare, any searching, screening or confiscation of items, including electronic devices, will be managed in line with the school behaviour policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance. The DSL will be informed of any search where there were reasonable grounds to suspect a pupil was in possession of a prohibited item, or where a search identifies a potential safeguarding risk. The DSL will consider the circumstances and any wider safeguarding concerns.

3.2 Responding to child protection concerns

Where safeguarding concerns are identified, the child's lived experience, voice and views will remain central to our decision-making, assessment and planning.

If staff are concerned about the safety or welfare of a child, they are expected to:

- listen carefully to child and reflect back the concern.
- use the child's own language.
- be non-judgmental.
- avoid leading questions, using open questions where necessary to clarify information, for example: who, what, where, when, or TED: Tell, Explain, Describe
- not promise confidentiality, as concerns will have to be shared further, for example, with the DSL and/or other agencies.
- be clear about boundaries and how the concern will be progressed.
- record the concern using the facts as the child presents them, in line with Trust's record keeping procedures.
- inform the DSL, as soon as practically possible.

All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate support. This applies when concerns first emerge and where a child is already known to other agencies. Staff will not assume that a colleague or another professional will act or share information that may be critical in keeping a child safe.

The Trust recognises that children should not be seen or relied upon as protective factors for adults. When considering family circumstances, adult vulnerabilities or parental needs, staff will remain focused on the child's needs, safety, welfare and lived experience. Staff will not assume that a child's presence, behaviour, affection, resilience or relationship with a parent/carer reduces risk, prevents harm, or means that an adult's needs are safely managed.

The school will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, the Kent Support Levels Guidance which follow the principle of 'Right Help, Right Time, Right Professional'.

- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on the KSCMP website: www.kscmp.org.uk

All staff will be made aware of the process for identifying, assessing and responding to children's needs in line with the Kent Support Levels Guidance. This includes understanding the criteria, including the level of need, for when children and families may be supported through:

- universal services and community-based Early Help
- the targeted early help level of Family Help, under sections 10 and 11 of the Children Act 2004
- statutory services under section 17 of the Children Act 1989, including children in need and disabled children
- statutory child protection processes under section 47 of the Children Act 1989, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm
- care and supervision proceedings under section 31 of the Children Act 1989
- accommodation under section 20 of the Children Act 1989.

Staff are not expected to make threshold decisions alone. If staff are concerned about a child's welfare or safety or are unsure what level of support may be required, they will speak to the DSL in line with this policy. The DSL will consider the concern in line with the Kent Support Levels Guidance, KSCMP procedures and local referral pathways.

Where safeguarding concerns are identified, options may include:

- managing support for the child internally through pastoral, welfare and/or safeguarding support processes, where this is appropriate and does not place the child at additional risk.
- considering whether parents/carers should be informed to further support the child's wellbeing, where it is safe and appropriate to do so.
- accessing universal services and community-based Early Help for *children with emerging needs*, including support available through Kent Family Hubs, the school and other local universal, voluntary or community services.
- making a Request for Support to the Front Door Service via the Kent Children's Services Portal where a child's needs cannot be met by universal or community-based early help support alone and coordinated, multi-disciplinary support may be required, or where there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm.

Community-based Early Help is support for children of all ages that improves a family's resilience, improves outcomes or reduces the chance of a problem getting worse. It is not a single service, but a system of support delivered by local authorities and their partners, including education providers. The Kent Support Levels Guidance describes this as '*children with emerging needs (Level 2)*'.

- Children at this level are usually best supported by professionals who already work with them, such as health professionals, early years settings, schools, and/or through community resources such as Family Hubs or voluntary services.
- A Request for Support via Front Door Service is not required for support at this level.
- Where community-based Early Help is appropriate, the DSL will consider what support can be provided within school and/or through local universal, voluntary or community services, including Kent Family Hubs.
- Where the need of a child/family escalate, become persistent, or cannot be met by universal or community-based Early Help alone, the DSL will consider whether a Request for Support to Family Help is required in line with the Kent Support Levels Guidance.

Where children and families have multiple and/or complex needs, or persistent needs, which cannot be met by universal or community-based early help support alone, they may require coordinated, multi-disciplinary support to prevent escalation through the targeted early help level of Family Help. The Kent Support Levels Guidance describes this as '*Family Help – Children with multiple and/or complex needs (Level 3)'*. Support at this level may include targeted early help and statutory support under section 17 of the Children Act 1989, where required to safeguard and promote the child's welfare.

- A Request for Support is required and will be made to the Front Door Service via the Kent Children's Services Portal.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and needs and risks cannot be safely managed through targeted or Child in Need Family Help support alone, a statutory child protection response is required. The Kent Support Levels Guidance describes this as '*Family Help – Children in need of protection (Level 4)'*.

- Safeguarding activity at this level is led under section 47 of the Children Act 1989
- A Request for Support is required and will be made to the Front Door Service via the Kent Children's Services Portal
- If a child is at immediate risk, the Request for Support will be marked as "urgent"
- If the child is in immediate danger, emergency services will be contacted using 999.

The Trust will take appropriate safeguarding action in response to concerns but will not investigate child protection concerns as a single agency or attempt to determine whether abuse, neglect or exploitation has occurred. Staff will record and report concerns in line with this policy and KSCMP procedures, and information will be shared with the Front Door and/or the police where appropriate, so that concerns can be considered through the appropriate multi-agency process.

The Trust recognises that children may be harmed in contexts outside the home, including within peer groups, the wider community and online. When making a Request for Support, the school will provide as much relevant information as possible so that any assessment can consider the full context of the child's lived experience and take a contextual approach to harm.

If the school believes a child may need support but is unclear whether a Request for Support should be submitted, the DSL may seek advice through a no-name consultation with the Front Door Service before deciding next steps. A consultation will not be used where a child is suffering, or is likely to suffer, significant harm; in these circumstances, a Request for Support will be submitted without delay.

The DSL will usually have responsibility for making Requests for Support and other safeguarding referrals. However, all staff are made aware of the local Kent process for making referrals to the Front Door and for statutory assessments under the Children Act 1989, including the role they may be expected to play in such assessments.

If staff have any concerns about a child's welfare or safety, they are expected to act on them immediately.

- If staff are unsure whether something is a safeguarding issue, they will speak to a DSL.
- If, in exceptional circumstances, a DSL or deputy DSL is not available, this must not delay appropriate action being taken. In these circumstances, staff should speak to a member of the senior leadership team, seek a consultation from the Front Door Service, contact the police where urgent action is required, or make a Request for Support themselves. Contact information is available in the safeguarding flowchart in this policy.
- Any safeguarding action taken by staff must be shared with the DSL as soon as possible.

Parents/carers will usually be spoken to where a Request for Support is being considered, and their agreement to engage will be sought where this is required and safe/appropriate to do so. This will be considered in line with KSCMP procedures and the Kent Support Levels Guidance.

- Parent/carer agreement to engage is not required for *'Family Help – Children in need of protection (Level 4)'*, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. A Request for Support must be made in these circumstances; however, it is good practice for the school to work openly and transparently with parents/carers and inform them of the Request for Support where it is safe to do so.

- Parents/carers will not be informed before a Request for Support is made where this may place a child at increased risk of harm, place an adult at risk of serious harm, prejudice the prevention or detection of serious crime, or undermine a criminal investigation.

If, after a Request for Support or other external intervention, a child's situation does not appear to be improving, or there are concerns about a decision or response, staff or the DSL will consider whether to re-refer and/or follow the Kent Safeguarding Children Escalation Procedure to ensure concerns are addressed and, most importantly, that the child's situation improves.

Any pastoral or welfare support provided by the school to children and families will be recorded and reviewed. The DSL will oversee support where families are requiring additional support, to ensure that school activity does not obscure potential safeguarding concerns from the wider professional network.

3.3 Multi-agency working

The Trust recognises the pivotal role education settings play in multi-agency safeguarding arrangements. We are committed to working in line with the Kent Safeguarding Children Multi-Agency Partnership procedures, the Kent Support Levels Guidance and the principle of 'Right Help, Right Time, Right Professional'.

The Trust, school leadership teams and DSL(s) will work to establish effective and co-operative relationships with safeguarding partners and other local agencies. This may include Children's Front Door, social workers, Family Help practitioners, health professionals, mental health services, specialist teachers, educational psychologists, other education settings and the police.

The school will work with partner agencies to provide a coordinated safeguarding response which promotes children's welfare and protects them from harm. This includes contributing to relevant multi-agency plans and meetings, such as child in need meetings, child protection conferences, core groups, strategy discussions and care planning meetings.

Where a child is supported through community-based Early Help, Family Help, child in need, child protection or care planning processes, the school will work with partner agencies to promote joined-up planning, avoid unnecessary duplication and ensure the child's educational needs, safety, voice and lived experience are considered.

The Trust will allow access for Kent Children's Social Care and, where relevant, a placing local authority, so that they can conduct, or consider whether to conduct, assessments under section 17 or section 47 of the Children Act 1989.

When making a Request for Support or contributing to statutory assessments, the school will provide relevant information about the child's presentation, attendance, progress, relationships, family circumstances, wider context and any known risks outside the home, including online, peer group or community-based concerns.

The Headteacher and DSL are aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning. The school will respond in line with relevant guidance and local procedures, including the school behaviour policy, where applicable.

3.4 Child Protection Records

All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the CPOMS online system. Where staff members, contractors or volunteers do not have access to the CPOMS system, concerns can be recorded as follows:

- Incident/concern forms are recorded and can be located at the main office, pastoral offices, Safeguarding office. Forms are logged onto CPOMS and then filed.

If there is an immediate safeguarding concern, staff will speak to the DSL first. Completing a written record must not delay urgent safeguarding action.

Records will be completed on CPOMS as soon as possible after the incident/event by the member of staff. They will be accurate, factual and written in a clear and professional manner, using the child's own words where relevant. Records will not include personal opinions unless these are clearly identified as professional judgement.

Staff will include relevant details such as the date, time, location, people present, the concern or disclosure, any visible injuries, the child's presentation and any action taken. A body map will be completed where visible injuries to a child have been observed.

If staff are unsure about recording requirements, they will seek advice from the DSL.

Our child protection records will include a clear and comprehensive summary of concerns, details of how concerns have been followed up and resolved, actions taken or not taken, decisions reached, the rationale for those decisions and any outcomes.

Child protection records will be kept confidential and stored securely. Records will be maintained separately from the child's main school record and retained in line with data protection legislation and the Trust's records management policy and schedule.

The DSL will have oversight of child protection records and will ensure they are reviewed, shared and transferred appropriately in line with statutory guidance, KSCMP procedures and the Trust's records management policy and schedule.

3.5 Transferring and receiving child protection files and safeguarding information

When a child leaves the school, the DSL will ensure that their child protection file is transferred to the DSL at the new setting as soon as possible. This will be within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

Child protection files will be transferred securely, separately from the child's main file, and in accordance with data protection legislation and statutory safeguarding guidance. Confirmation of receipt will be obtained.

In addition to transferring the child protection file, the DSL will consider whether it is appropriate to share relevant information with the DSL at the new setting in advance of the child leaving. This may include information to support the new setting to undertake an assessment of risk to others, as well as to make arrangements to safeguard the child, promote their welfare or continue appropriate support. Where there are safeguarding concerns, known risks or significant support needs, the DSL will instigate a direct conversation with the new setting to support effective information sharing and transition planning.

Where the school receives a child protection file from another setting, the DSL will review the records and ensure relevant staff are made aware of information they need to know in order to safeguard and support the child. This may include the Special Educational Needs Co-ordinator (SENCO), pastoral staff, relevant teaching staff or other appropriate members of staff.

Where information shared during transition indicates that a child may present a risk to others and/or may be at risk themselves, the DSL will consider what safeguarding action is required before, or as soon as possible after, the child starts. This may include completing or reviewing a safeguarding risk assessment and putting in place an appropriate safety and support plan.

Where a child joins the school and no child protection file is received, the DSL will proactively contact the previous setting to confirm whether a child protection file exists and, if so, ensure it is transferred securely without delay.

3.6 Confidentiality and information sharing

The Trust recognises its duty and powers to hold, use and share relevant information with appropriate agencies where this is necessary to safeguard and promote the welfare of children. Information will be shared at the earliest opportunity where this is needed to identify, assess or respond to risk, in line with Keeping Children Safe in Education, Working Together to Safeguard Children, KSCMP procedures and data protection legislation.

The Trust has an appropriately trained Data Protection Officer (DPO) in line with data protection law requirements. The DPO is Charlotte Robinson (email: dpo@kcsp.org.uk).

All staff are made aware of the need to protect children's privacy and to handle information in a way that is lawful, proportionate and secure. Staff are also made aware that confidentiality must never prevent appropriate safeguarding action from being taken.

Staff will not promise confidentiality to a child, as safeguarding concerns may need to be shared with the DSL, the Front Door Service, the police and/or other agencies where appropriate.

Staff are expected to be proactive in sharing information as early as possible to help identify, assess and respond to concerns about a child's safety, welfare or wellbeing. Staff will not assume that a colleague or another professional will share information that may be critical to keeping a child safe.

Data protection laws do not prevent the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Information sharing decisions will be informed by safeguarding need, risk assessment, proportionality, data protection requirements and the need to promote the welfare and safety of the child and others.

Staff will have due regard to relevant data protection laws and principles, including when information should be shared and when it should be withheld. Staff will receive appropriate information and guidance about confidentiality, information sharing and data protection.

Where possible and appropriate, staff will be open and transparent with children and families about what information may be shared, with whom and why. However, information may be shared without agreement where this is necessary to safeguard a child, promote a child's welfare, prevent delay or avoid increasing risk.

The Headteacher and DSL will share relevant safeguarding information with staff on a need-to-know basis, so that staff can safeguard and support children appropriately.

Staff can access further information through the Trust's data protection policy, information security policy and records management policy.

3.7 Complaints

All members of the Trust community should feel able to raise or report any concerns about children's safety, safeguarding practice or potential failures in the Trust's or school's safeguarding arrangements.

The Trust has a complaints procedure available to parents/carers, pupils, staff and visitors who wish to raise a concern or complaint. This can be found on the school website.

The Trust take all safeguarding concerns, complaints and whistleblowing reports seriously. Concerns will be considered and responded to in line with the relevant policy and procedure.

Whilst we encourage members of our community to raise concerns directly with the school where appropriate, we recognise this may not always be possible.

- Children, young people or adults who have experienced, witnessed or are concerned about sexual abuse or harassment in education settings can contact the NSPCC Report Abuse in Schools helpline on 0800 136 663.
- Staff who do not feel able to raise concerns about child protection failures internally, or who feel their concerns are not being addressed, can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285

Any concern or complaint that constitutes an allegation against, or concern about, a member of staff, supply teacher, volunteer or contractor will be dealt with in line with section 8 of this policy.

4 Specific Forms of Abuse and Other Safeguarding Issues

We recognise that children may be vulnerable to a wide range of safeguarding issues, both inside and outside the home, including online. Staff will maintain an attitude of 'it could happen here' and will report any concerns to the DSL in line with section 3 of this policy.

Further information about specific safeguarding issues is available in Keeping Children Safe in Education.

4.1 Child-on-child abuse (including harassment and violence)

All members of staff recognise that children can abuse other children; this is known as child-on-child abuse and may take place online, face-to-face, physically, verbally or through a combination of channels.

Staff will maintain an attitude of "it could happen here". Even if there are no reported cases of child-on-child abuse, staff will remain alert to the possibility that it may be taking place and not being reported.

We adopt a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours, misogyny/misandry, and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

We recognise that child-on-child abuse can take many forms, including but not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- abuse in intimate personal relationships between children, sometimes known as 'teenage relationship abuse'.
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, including where there is an online element which facilitates, threatens and/or encourages physical abuse.
- serious physical assault and harm, or the threat of harm with a weapon.
- sexual violence such as rape, assault by penetration and sexual assault, including where there is an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual making or sharing of nudes and semi-nudes (previously known as sexting or youth produced sexual imagery), including where generated by Artificial Intelligence (AI)
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals, which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

We recognise that harmful sexual behaviour exists on a continuum, from developmentally inappropriate or problematic sexual behaviour through to abusive behaviour and sexual violence.

Concerns will be considered in context, taking account of the age and stage of development of the children involved, any power imbalance, coercion, threats, exploitation, the nature of the behaviour, the impact on those affected, and any wider safeguarding risks.

All staff have a role to play in challenging inappropriate, harmful or abusive behaviours between children. Staff will be alert to factors which may increase risk or affect how children experience or report abuse, including age, developmental stage, sex, ability, SEND, culture, ethnicity, sexual orientation, gender identity, power imbalance, peer group dynamics and wider contextual factors. Staff will be aware of the possibility that children

may minimise, normalise or not recognise harmful behaviours, and that some behaviours may be facilitated, threatened, encouraged or shared online.

We recognise that for some (but not all) forms of child-on-child abuse, girls are more likely to be victims and boys are more likely to be perpetrators. However, all child-on-child abuse is unacceptable, will be taken seriously and will be responded to in line with this policy.

We recognise that the law is in place to protect children rather than unnecessarily criminalise them. Where relevant, this will be explained to pupils in an age and developmentally appropriate way which avoids alarming or distressing them, while making clear that harmful, abusive or non-consensual behaviour is unacceptable and will be taken seriously.

We want children to feel confident to report abuse, knowing that their concerns will be treated seriously and that they will be supported and kept safe. The Headteacher will ensure reporting systems are well promoted, easily understood and easily accessible. Children who report child-on-child abuse will be reassured that they are not creating a problem and will not be made to feel ashamed for sharing a concern.

We recognise that child-on-child abuse is a safeguarding issue for all children involved. We will consider the safety, welfare and support needs of the child who has experienced harm, any other affected children, and the child alleged to have caused harm.

Any concerns or allegations relating to child-on-child abuse, whether on-site, off-site or online, will be recorded and reported to the DSL in line with this policy.

- The DSL will consider the concern in line with relevant policies and procedures, including behaviour, anti-bullying and child protection procedures.
- The DSL will consider the behaviour in context, including the child's age and stage of development, any SEND or communication needs, trauma or abuse history, power imbalance, coercion, intent, frequency, escalation and the impact on others.
- Concerns will be responded to, and where appropriate investigated under relevant procedures, while recognising the need to engage with multi-agency processes where safeguarding or child protection concerns are identified.
- Where concerns involve harmful sexual behaviour, sexual harassment or sexual violence, DSLs will respond in line with Part five of KCSIE.
- Responses will always be child-centred, proportionate and based on the circumstances of the case.

When a concern of child-on-child abuse is reported, a DSL will consider whether an immediate risk and needs assessment is required. This will be considered on a case-by-case basis and may include:

- the wishes and feelings of the child who has been harmed
- the nature of the concern or alleged incident
- whether a crime may have been committed
- whether harmful sexual behaviour may have been displayed
- the ages and developmental stages of the children involved
- any power imbalance, coercion, intimidation or exploitation
- whether the concern appears to be a one-off incident or part of a pattern of behaviour
- any vulnerability, SEND or additional needs affecting the children involved
- any online elements or wider contextual factors
- any ongoing risks to the child who has been harmed, other children, staff or the wider school community
- whether the concern links to other safeguarding issues, such as child sexual exploitation, child criminal exploitation, serious violence or abuse within intimate personal relationships between children.

The risk and needs assessment, where completed, will be recorded and kept under review. Actions will be taken to protect and support all children involved and to address any wider safeguarding risks within the school environment.

We will take appropriate safeguarding, pastoral and/or behaviour-related action in response to child-on-child abuse. However, where the concern indicates that a child may require Family Help, statutory support or protection, a DSL will make a Request for Support via the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and KSCMP procedures.

The school will normally inform parents/carers of the children involved in child-on-child abuse, unless doing so would place a child at risk of harm, place another person at risk, prejudice the prevention or detection of crime, or undermine a police or statutory safeguarding response.

- Information shared with parents/carers will be relevant to their own child and shared in line with safeguarding, confidentiality and data protection requirements. The school will not share confidential information about other children, including any safeguarding action, support or sanctions, unless there is a lawful and appropriate basis to do so.

Child-on-child abuse is preventable. Timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. We will work to minimise the risk of child-on-child abuse by creating a safe culture, promoting respectful relationships, providing appropriate curriculum opportunities, ensuring children know how to report concerns, and responding consistently to harmful behaviour.

Child-on-child abuse is preventable. Timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. We will work to minimise the risk of child-on-child abuse by creating a safe culture, promoting respectful relationships, providing appropriate curriculum opportunities, ensuring children know how to report concerns, and responding consistently to harmful behaviour.

- This is addressed in our PSHE/RSE curriculum.
- Our anti-bullying policy is robustly implemented.
- Students are encouraged to report any incidents to staff either directly or using our anonymous email in the students' section of the website.

Children affected by child-on-child abuse will be supported according to their needs. This may include pastoral support, trusted adult support at home and with any services involved, safety planning, reasonable adjustments, signposting to local or national services, working with parents/carers, curriculum responses, behaviour support, referrals to external agencies and arrangements to reduce contact or manage risk where appropriate

4.2 Making or sharing nudes and/or semi-nudes

We recognise that all incidents involving the making or sharing of nudes or semi-nudes, whether consensual or non-consensual, will require a safeguarding response.

For the purpose of this policy, nudes and semi-nudes means nude or semi-nude images, videos or livestreams of children under the age of 18. This includes imagery that is taken/created by a child, taken/created by a child and shared by another person, digitally altered, or generated using artificial intelligence (AI). Nudes and semi-nudes may be shared online, between devices, through social media, messaging apps, gaming platforms, forums, livestreams or other digital routes.

Creating, possessing or sharing nudes and semi-nudes of children under 18, including where this has happened with consent, is illegal and can present complex safeguarding issues. However, we recognise that the law is in place to protect children rather than unnecessarily criminalise them. Responses will therefore be child-centred, proportionate and focused on safeguarding and supporting the children involved.

All concerns must be reported to and managed by the DSL in line with this policy, the Kent and Medway Responding to Nude and Semi-Nude Image Sharing Guidance, the Kent Support Levels Guidance and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance.

When made aware of concerns involving consensual or non-consensual sharing of nudes and semi-nudes, staff must:

- report the concern to the DSL immediately.
- never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it.
- report immediately to the DSL if imagery has been viewed inadvertently
- not delete the imagery or ask the child to delete it.
- not investigate images themselves or ask children involved to disclose information about the imagery, as this is the responsibility of the DSL.
- avoid saying or doing anything which may blame or shame any child involved.
- reassure the child that they will be supported and kept safe.
- explain that the concern must be shared with the DSL and that confidentiality cannot be promised.
- not share information about the incident with other staff, children, parents/carers or other families.

When made aware of a concern involving making or sharing of nudes and semi-nudes, the DSL will hold an initial review meeting in line with the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may include speaking with relevant staff and children, involving parents/carers where safe and appropriate, seeking advice, making a Request for Support via the Kent Children's Services Portal, and/or contacting the police where required.

Parents/carers of children involved in making or sharing nudes or semi-nudes, will be informed at an early stage, unless there is good reason to believe that involving them would put a child at risk of harm.

A Request for Support will be made to the Front Door Service via the Kent Children's Services Portal, and/or the police informed immediately if:

- the incident involves an adult (over 18).
- there is reason to believe that a child has been coerced, blackmailed, groomed or exploited.
- there are concerns about a child's capacity to consent, including due to age, developmental stage, vulnerability or additional needs
- the imagery involves sexual acts, violence, threats, exploitation or other high-risk features (for example, a child under the age of thirteen, or images depict sexual acts which are unusual for the child's developmental stage)
- a child is at immediate risk of harm
- there are wider safeguarding concerns, including links to child sexual exploitation, child criminal exploitation, harmful sexual behaviour or abuse within intimate personal relationships between children.

All decisions and action taken regarding nude or semi-nudes will be responded to and recorded in line with our child protection procedures.

The DSL may choose to involve other agencies where there are concerns about nudes or semi-nudes at any time, including if further information is disclosed at a later date or there are additional concerns or incidents.

If the DSL is unsure if a Request for Support is appropriate, advice will be sought from the Front Door Service.

4.3 Exploitation, including child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, serious violence and modern slavery

We recognise that Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines, serious violence and modern slavery are safeguarding issues and may overlap. Children may also experience exploitation alongside other forms of abuse, neglect or harm. We will therefore need to consider the full context of the child's lived experience, including risks outside the home, peer groups, community locations, transport routes and online environments.

We recognise that CSE and CCE are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. This may involve an exchange for something the child needs or wants, and/or be for the financial advantage or increased status of the perpetrator or facilitator, and/or involve violence or the threat of violence.

We recognise that exploitation may be committed or facilitated by individuals, organised networks or gangs, and the child may identify as being part of the group that is exploiting them. Exploitation can affect children of any age and sex, and it is not possible for a child to consent to being exploited, abused or trafficked.

Children may not recognise that exploitation is happening to them and may be manipulated, groomed or coerced into situations they do not fully understand. Children who are exploited may also be coerced, controlled, threatened or manipulated into activity which appears to be offending behaviour, and the school will consider whether such behaviour may be linked to exploitation before responding.

We recognise that:

- **Child Sexual Exploitation** (CSE) is a form of child sexual abuse. CSE can be a one-off occurrence or a series of incidents over time and may range from opportunistic to complex organised abuse. CSE can affect any child who has been coerced into sexual activity, including 16- and 17-year-olds who can legally consent to sexual activity. Some children may believe they are in a genuine romantic relationship and may not recognise that they are being exploited.
- **Child Criminal Exploitation** (CCE) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime, threatening or committing serious violence, or carrying weapons. Children can become trapped in criminal exploitation through threats, violence, intimidation, debt bondage, grooming or coercion, including threats towards their families. The experience of girls who are criminally exploited can be different from that of boys, and indicators may not be the same. Girls are also at risk of criminal exploitation. Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation.
- **County lines** is a form of criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other forms of “deal line” to export illegal drugs. This activity can happen locally as well as across the UK; no specific distance of travel is required. Children may be exploited to move, store or sell drugs or money and may be controlled through coercion, intimidation, violence, threats, debt bondage, online activity or exploitation of their family circumstances.
- **Serious violence** includes violence and exploitation involving weapons, gangs, criminal networks or serious physical harm. It can involve carrying, threatening with, or using knives or other weapons, or concerns that a child may be exposed to weapons through peers, gangs, criminal networks or community-based harm. The likelihood of involvement in serious violence may be increased by factors such as being male, having been suspended, spent time in alternative provision or been permanently excluded, having experienced child maltreatment, having been involved in offending, having used drugs or alcohol in early adolescence, or having previously been a victim or displayed violence. Serious violence can often peak in the hours just before or after school, including when children are travelling to and from the setting, and may be concentrated in particular places.
- **Modern slavery** includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, criminal exploitation, forced criminality, forced labour, domestic servitude and the removal of organs.

Staff will be alert to indicators that a child may be at risk of, or experiencing, exploitation, county lines or serious violence. These may include:

- unexplained gifts, money or new possessions
- increased absence from school or regularly missing education
- going missing from home or care, or regularly returning home late
- changes in friendship groups or relationships with older individuals or group
- a significant decline in educational performance
- signs of assault, unexplained injuries, self-harm or changes in wellbeing
- drug or alcohol misuse

- association with others involved in exploitation, gangs or criminal networks
- receiving requests for drugs via a phone line, moving drugs or collecting money
- being found in accommodation with which they have no connection, sometimes referred to as a trap house, cuckooing address or hotel room linked to drug activity
- owing money or a “debt bond” to exploiters
- having their bank account used to facilitate criminal activity
- being vulnerable to grooming, coercion, threats, intimidation or online exploitation.

Staff will seek to understand when and where children may feel unsafe, including by listening to children, consulting other staff members and working with partners to understand the local context and support a coordinated safeguarding response.

We recognise that children who have been exploited may need additional support to help keep them safe and engaged in education.

If staff are concerned that a child may be at risk of, or experiencing, child sexual exploitation, child criminal exploitation, county lines, serious violence, trafficking or modern slavery, they will report their concerns to the DSL without delay.

The DSL will consider concerns about exploitation in line with this policy and relevant local and national guidance and make referrals or reports as appropriate.

- The DSL will consider use of the Kent and Medway Child Exploitation Identification Tool where there are concerns that a child may be experiencing, or be vulnerable to, exploitation.
- Where broader intelligence is known about potential exploitation or other community safety concerns, the DSL will consider whether information should be shared with Kent Police through the Community Partnership Intelligence Portal.
- Where modern slavery or trafficking is suspected, relevant safeguarding and/or child protection procedures will be followed, and the DSL will consider whether a referral through the National Referral Mechanism is required.
- Any safeguarding concerns for children will be referred to the Front Door Service and/or police as appropriate. If there is a crime in progress or immediate risk, emergency services will be contacted using 999.

When sharing information or making a Request for Support to the Front Door Service or other appropriate agencies, we will provide as much relevant information as possible to support a contextual safeguarding response. This may include information about the child’s presentation, attendance, peer relationships, online activity, family circumstances, community risks, known locations of concern, transport routes, patterns of absence, and any indicators of exploitation, trafficking, modern slavery or serious violence.

4.4 Domestic abuse

We recognise that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can include, but is not limited to, psychological, physical, sexual, financial/economic or emotional abuse, including coercive and controlling behaviour. Domestic abuse can take place inside or outside the home and within different types of relationships, including intimate partner relationships, ex-partners and family members. Types of domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent or caregiver abuse.

We recognise that anyone can be a victim of domestic abuse, regardless of sex, age, ethnicity, socio-economic status, sexuality, background or identity.

We recognise that children can be victims of domestic abuse in their own right if they see, hear or experience the effects of abuse. Children may also experience domestic abuse within their own intimate relationships, sometimes referred to as teenage relationship abuse. Where one or both children are under 16, this may not fall within the statutory definition of domestic abuse, but it will still be responded to as a safeguarding concern. Domestic abuse can have a detrimental and long-term impact on children’s health, wellbeing, development and ability to learn. Domestic abuse may occur, continue or escalate following separation. Concerns will not be

viewed in isolation, and the school will consider the child's lived experience, family circumstances and any wider safeguarding risks.

Staff will respond to domestic abuse concerns in a trauma-informed way and will avoid victim-blaming language or assumptions.

If staff are concerned that a child may be seeing, hearing or experiencing the effects of domestic abuse, or experiencing abuse within their own intimate relationship, they will report their concerns to the DSL.

The DSL will consider concerns about domestic abuse in line with this policy, KSCMP procedures, the Kent Support Levels Guidance and any relevant local or national guidance. Where the concern indicates a need for Family Help, statutory support or protection, the DSL will consider whether a Request for Support should be made via the Kent Children's Services Portal. If a child or adult is in immediate danger, emergency services will be contacted using 999.

We participate in Operation Encompass. Operation Encompass is an information-sharing scheme between the police and education settings which supports schools to provide timely, informed support to children affected by domestic abuse. Police forces in England have a duty to notify a child's school where they have attended a domestic abuse incident and have reasonable grounds to believe a child may be a victim of domestic abuse. This includes children connected to the household regardless of whether they were present at the incident.

Operation Encompass notifications will help the school to have up-to-date and relevant information about a child's circumstances so that appropriate support can be considered according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures, and where there are concerns about a child's welfare, the DSL will consider whether a Request for Support is required in line with the Kent Support Levels Guidance.

Operation Encompass notifications will be handled confidentially, stored securely and managed in line with data protection requirements and school child protection recording procedures. The DSL will have oversight of notifications and will ensure that relevant information is shared with staff on a need-to-know basis to safeguard and support the child.

Where the school is unsure how to respond to an Operation Encompass notification, advice may be sought from the Front Door Service or from the Operation Encompass advice and helpline service: 0204 513 9990.

4.5 Honour or Faith-Based Abuse (HBA)

We recognise that honour or faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community. This can include female genital mutilation, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Staff will be alert to this dynamic and the additional risks it may create when deciding what safeguarding action is required.

All forms of HBA are abuse, regardless of the motivation, and will be handled and escalated as such. If staff have any concerns that a child may be at risk of, or has experienced, honour or faith-based abuse, they will speak to the DSL without delay. The DSL will consider concerns in line with this policy, KSCMP procedures, the Kent Support Levels Guidance and any relevant national or local guidance. If there is an immediate threat or danger, the police will be contacted.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.

- All staff will speak to the DSL if they have any concerns that a child may be at risk of FGM or may have experienced FGM.
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to directly report to the police where they discover that

FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

- It will be rare to see visual evidence of FGM, and staff must not examine pupils. Unless staff have good reason not to, they should also discuss the concern with the DSL. The mandatory reporting duty does not apply to suspected or at-risk cases where FGM has not been discovered; in these cases, staff must follow local safeguarding procedures and speak to the DSL.

Forced marriage is a crime.

- A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or another form of coercion is used. Coercion may be physical, emotional or psychological. A lack of full and free consent can also arise where a person cannot consent, for example due to learning disabilities.
- It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even where violence, threats or another form of coercion are not used. This applies to non-binding, unofficial "marriages" as well as legal marriages.
- Staff will report any concerns about forced marriage to the DSL. Advice can also be sought from the Forced Marriage Unit: 020 7008 0151 or fmu@fcdo.gov.uk

4.6 Preventing radicalisation

We recognise that children may be susceptible to radicalisation into terrorism. Protecting children from this risk forms part of the school's wider safeguarding approach. The Trust is aware of its duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This is known as the Prevent duty.

For the purposes of this policy:

- **extremism** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **radicalisation** is the process of a person legitimising support for, or use of, terrorist violence
- **terrorism** is an action that endangers or causes serious violence to people, causes serious damage to property, or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We recognise that there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. As with other safeguarding risks, staff will be alert to changes in behaviour, presentation, language, relationships or online activity which may indicate that they are in need of help or protection.

Staff will use their professional judgement and act proportionately where they have concerns that a child may be susceptible to radicalisation. Any concerns will be reported to the DSL in line with this policy.

The DSL and senior leaders will be familiar with the Prevent duty guidance and local procedures for making a Prevent referral. The school's approach to Prevent will be considered as part of wider safeguarding arrangements and will include appropriate attention to:

- leadership and partnership
- staff capability, training and awareness
- reducing permissive environments, including online environments, external speakers, visitors, use of premises and access to extremist or terrorist content.

We will ensure that staff receive appropriate Prevent training so they understand the Prevent duty, can recognise concerns, know how to report them internally, and understand the local Prevent referral process. The DSL will receive more in-depth training to enable them to support staff on Prevent matters and provide updates on relevant issues.

Where the DSL considers that a Prevent referral may be appropriate, this will be managed in line with local Kent Prevent procedures, the Kent Support Levels Guidance and relevant national guidance. The DSL may seek advice from the Kent and Medway Prevent Team where appropriate. If there is an immediate threat to safety, emergency services will be contacted using 999.

Prevent referrals are assessed by police and may be passed on to a multi-agency Channel panel to consider whether support is required. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. A representative from the school may be asked to attend a Channel panel to support assessment and planning.

Where a child is receiving support through Prevent or Channel and moves to a new setting, the DSL will share relevant information with the DSL at the new setting in advance of the child leaving, so that support can continue when the child arrives.

4.7 Cybercrime

The Trust recognises that cybercrime is criminal activity committed using computers and/or the internet. Cybercrime is broadly categorised as either **cyber-enabled** or **cyber-dependent**.

- **Cyber-enabled crime** refers to crimes that can happen offline but are enabled at scale and speed online, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online harassment or other technology-assisted harm.
- **Cyber-dependent crime** refers to crimes that can only be committed using a computer, computer network or internet-enabled device. This may include unauthorised access to computers, sometimes referred to as hacking, denial of service attacks or "booting", and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets or Remote Access Trojans.

We recognise that children with particular skills and interests in computing and technology may inadvertently or deliberately become involved in cyber-dependent crime, sometimes without understanding the legal, ethical or safeguarding implications.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent crime, they will report their concerns to the DSL. The DSL will consider the concern in line with this policy, the Kent Support Levels Guidance and any relevant local or national guidance.

Where appropriate, the DSL may consider accessing local support and/or referring to the Cyber Choices programme.

Cyber Choices is focused on cyber-dependent crime. Concerns about cyber-enabled crime, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online bullying or other online safety concerns, will be responded to in line with this policy and relevant school safeguarding, behaviour, acceptable use and online safety arrangements.

If the concern indicates that a child may require Family Help, statutory support or protection, the DSL will consider whether a Request for Support should be made via the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and KSCMP procedures. If a child is in immediate danger, emergency services will be contacted using 999.

4.8 Bruising in non-mobile children

Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.

If we are concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the 'Kent and Medway Protocol for the Management of Actual or Suspected Bruising in Infants and Children who are not Independently Mobile' procedures (2.2.8 of the KSCMP procedures). In summary, these procedures state:

- If a child appears seriously ill or injured, emergency treatment should be sought through an emergency department (ED) and the Front Door Service should be notified of the concern and the child's location.
- In all other cases:

- Staff must inform the DSL immediately and describe and document accurately on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
- Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.
- If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to the Front Door Service, who have responsibility for arranging further multi-agency assessments.
- If there are concerns regarding the immediate safety of the child or staff, the police will be called.
- If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the Front Door Service.

4.9 Child abduction and community safety incidents

We recognise that child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known to the child, or by strangers.

We also recognise that community safety incidents in the vicinity of the school can raise safeguarding concerns for children, parents/carers and staff. Staff will report any concerns about child abduction or community safety incidents to the Headteacher and/or DSL immediately. Where there is an immediate risk to a child, emergency services will be contacted using 999.

We will support children to develop age-appropriate personal safety awareness through the curriculum and wider safeguarding education. This will focus on building children's confidence, judgement and ability to seek help, rather than simply warning them about strangers.

4.10 Children and the court system, including children affected by parental separation, court orders or family disputes

We recognise that children may be affected by the court system in different ways, including where they are required to give evidence in criminal proceedings or where they are affected by private or public family law proceedings, child arrangements or parental disputes.

Where staff are aware that a child is involved in, or affected by, court proceedings, they will share relevant information with the DSL so that appropriate support can be considered. This may include pastoral support, adjustments within school, liaison with parents/carers where appropriate, and working with partner agencies where this is needed to safeguard and promote the child's welfare.

We recognise that parental separation, child arrangements and family court processes can be stressful for children and may contribute to conflict, anxiety or safeguarding concerns. The welfare and best interests of the child will remain central to the school's decision-making.

Where parents/carers disagree about arrangements, decisions or the exercise of parental responsibility, the school will act in line with statutory guidance, relevant court orders, education law, safeguarding duties and data protection requirements. Where necessary, parents/carers may be advised to seek independent legal advice or resolve disputes through the appropriate legal route.

We will consider any court orders or legal restrictions that are shared with the setting and relevant to the child's education, welfare or safety. Parents/carers may be asked to provide the most recent court order where this is appropriate and/or necessary to help the school understand arrangements or restrictions.

Staff will remain alert to any safeguarding concerns arising from parental disputes, child arrangements or court proceedings. Concerns will be reported to the DSL and responded to in line with this policy.

4.11 Homelessness

We recognise that being homeless, or being at risk of homelessness, can present a real risk to a child's welfare. The DSL will be aware of local contact details and referral routes into the Local Housing Authority so that concerns can be raised or progressed at the earliest opportunity. Discussion with, or referral to, the Local Housing Authority does not replace safeguarding action where a child has been harmed or is at risk of harm

In most cases, homelessness concerns will relate to children living with their families. However, some 16- and 17-year-olds may be living independently from their parents or carers, for example due to exclusion from the family home. Where this is the case, the DSL will make appropriate referrals based on the child's circumstances, including to the Front Door Service where safeguarding or accommodation concerns are identified.

Where the school receives information that a child has been placed in temporary accommodation, the DSL will consider what support may be required to safeguard and promote the child's welfare. This may include considering the impact on attendance, wellbeing, learning, transport, access to resources and family support needs.

4.12 Children with family members in prison or affected by parental offending

We recognise that children with family members in prison, or who are otherwise affected by parental offending, may experience additional emotional, practical and safeguarding needs. This may include stigma, isolation, poverty, poor mental health, disrupted family relationships, attendance concerns or changes in behaviour.

Staff will share any concerns with the DSL so that appropriate support can be considered. This may include pastoral support, safe adult support, signposting to specialist services, liaison with parents/carers where appropriate, and consideration of early help or wider multi-agency support. We will respond to children affected by parental imprisonment or offending in a sensitive and trauma-informed way, recognising the potential impact on the child's safety, wellbeing, attendance, learning and relationships.

5 Supporting Children Potentially at Greater Risk of Harm

We recognise that some children may be more vulnerable to abuse, neglect, exploitation or harm, or may face additional barriers to recognising, reporting or being supported with safeguarding concerns. Staff will be alert to the needs and experiences of these children and will ensure concerns are reported to the DSL in line with this policy.

The school will take a child-centred, trauma-informed and contextual approach, considering the child's voice, lived experience, individual circumstances and any barriers they may face in accessing help or support.

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

We recognise that children with special educational needs or disabilities (SEND), can face additional safeguarding challenges both online and offline.

We recognise that additional barriers can exist when recognising abuse, neglect and exploitation for these children. These may include:

- assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's SEND without further exploration.
- children being more prone to peer group isolation or bullying, including prejudice-based bullying
- the potential for children with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- communication barriers and difficulties in managing or reporting concerns.
- children not understanding that what is happening to them is abuse, neglect or exploitation.
- the need for intimate or personal care, or children being isolated from others.
- children being more dependent on adults for care and support.

- difficulties with cognitive understanding.

Staff will appropriately explore potential indicators of abuse, neglect and exploitation and will not assume that these are related to a child's SEND. Concerns will be reported to the DSL in line with this policy.

The school will support children with SEND to communicate, be listened to and have their voice heard and acted upon. Staff will consider whether reasonable adjustments, communication aids, trusted adults or other support may be needed to help children share concerns.

Any report or concern involving a child with SEND will require close liaison between the DSL and the SENCO, where appropriate.

We will consider whether extra pastoral support, communication support or other adjustments are required to safeguard and promote the welfare of children with SEND.

The Trust has an intimate care policy which promote children's health, safety, independence and welfare, while respecting their dignity and privacy. Arrangements for intimate and personal care will be open, transparent and appropriately recorded. Further information can be found in the Intimate Care policy on the school website.

5.2 Safeguarding children with medical conditions

We recognise that children with medical conditions, including allergies, should be properly supported so they can access education safely and fully. Further information can be found in the following policies, which can be found on the school website:

- Supporting pupils with medical conditions policy
- Allergy management policy
- First aid policy.

An incident relating to the management of a child's medical condition, including allergies, will not automatically require safeguarding actions. However, staff will report concerns to the DSL where an incident, pattern of incidents or wider information suggests that a child may be at increased risk of abuse, neglect or exploitation because of their medical condition. This may include, for example, where relevant information about a child's medical condition is not shared with the school, where a child is repeatedly sent to school without essential medication or equipment, or where agreed healthcare arrangements are not followed in a way that places the child at risk.

The DSL will consider concerns in line with this policy, national and local guidance and relevant school medical or allergy arrangements. Where appropriate, this may include considering whether a Request for Support should be made.

5.3 Children requiring mental health support

We have an important role to play in supporting the mental health and wellbeing of our pupils. We recognise that mental health problems can, in some cases, develop into safeguarding concerns, including where there are concerns about self-harm, eating disorders, suicidal ideation or risk of suicide. Mental health problems can also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals should diagnose a mental health problem. However, we recognise our staff are well placed to observe children day-to-day and identify those whose behaviour, presentation or circumstances suggest that they may be experiencing a mental health problem or be at risk of developing one.

- Staff will be alert to potential warning signs that a child may be struggling with their mental health. These may include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually enjoy, physical signs of self-harm, neglecting themselves, suicidal ideation, changes in attendance, engagement, relationships or emotional wellbeing.

- Not every child who displays these behaviours will have a mental health concern. However, staff will remain professionally curious and will record and report any concerns so children can receive appropriate support and early intervention.

If staff have a concern about a child's mental health or wellbeing, they will follow the school's processes for recording and reporting concerns.

If a mental health concern is also a safeguarding concern, staff will speak to the DSL in line with this policy. The DSL will consider whether the child may benefit from support through universal services or community-based early help, or whether a Request for Support is required. Where mental health support is needed, parents/carers will be informed to support the child's wellbeing, unless doing so would place the child at additional risk.

If staff believe that a child is in immediate danger, emergency services will be contacted using 999 or arrangements will be made for the child to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs urgent help for their mental health but it is not an emergency, help will be sought through NHS 111.

We will consider the range of locally available support to meet children's mental health and wellbeing needs. This may include internal pastoral support, the senior mental health lead, Mental Health Support Teams, school nursing, early help/Family Help, NHS services, early support hubs, young futures hubs, voluntary sector support and specialist services.

We will ensure that any mental health support or intervention offered is appropriate to the child's needs, age and phase of education, and is evidenced as safe and effective. We will support children's mental health and wellbeing by:

- promoting positive mental wellbeing and resilience.
- observing pupils and identifying early those who may be experiencing mental health problems or be at risk of developing them.
- ensuring early targeted support is considered and provided where appropriate.
- liaising with and/or referring to specialist services where needed.

Age and ability appropriate education will be provided to pupils to help promote positive mental health, wellbeing and resilience. This is achieved through the PSHE/RSE curriculum, pastoral care, working alongside a wide range of external agencies and assemblies.

5.4 Children who are absent from education

In line with the Working Together to Improve School Attendance and Children Missing Education statutory guidance, we recognise that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues, including abuse and neglect, child sexual exploitation, child criminal exploitation and county lines.

We recognise that a robust response to absence supports the identification of safeguarding concerns and may help prevent the risk of children becoming missing from education in the future.

Staff will be alert to patterns of absence, persistent absence, severe absence, repeated absence, unexplained absence and children missing from education in line with the Trust's attendance policy. Where absence raises a welfare or safeguarding concern, staff will report this to the DSL in line with this policy.

The DSL will consider whether absence may be linked to wider safeguarding risks within the family or community, including abuse, neglect, exploitation, mental health concerns, domestic abuse, forced marriage, FGM, trafficking, serious violence, county lines, online harm or other extra-familial harm.

Where possible, the school will hold more than one emergency contact number for each pupil, so there are additional options to contact a responsible adult where a child who is absent from education is also identified as a welfare or safeguarding concern.

- we will seek to hold emergency contact information for both parents where appropriate, unless doing so would place a child at risk of harm or be contrary to a court order or other legal restriction.
- Where contact with a parent or other adult is restricted or unsafe, this will be clearly recorded in line with school safeguarding and record keeping procedures.
- the school will be proactive in understanding children's significant relationships and lived experiences, including the role of fathers, non-resident parents and other adults who may be important in the child's life, where this is appropriate and safe.

We recognise that a child may be considered missing from education at any stage where their whereabouts, education provision or safety cannot be established.

Where the school has concerns that a child has unexplained, persistent, repeated or prolonged absence, or may be missing from education, action will be taken in line with statutory duties and local procedures. This may include working with parents/carers, Kent PRU and Attendance Service (KPAS), the local authority CME team, the Front Door Service and/or other agencies as appropriate.

Where there are concerns that a child may be missing from education, including where the school becomes aware that a child has moved out of area or their whereabouts are unknown, the school will make a referral to KPAS promptly so that appropriate checks can be undertaken. The school will not delay referral while completing local enquiries where this may prevent timely action by the local authority.

Where there are concerns that a child may be missing from education or where their absence raises welfare or safeguarding concerns, the DSL will make a Request for Support as appropriate.

We will provide information to the local authority where required when a child is removed from roll, including at standard and non-standard transition points, in line with Children missing education statutory guidance and local procedures.

5.5 Children attending alternative provision

Where the school places a pupil with an alternative provision provider, the school remains responsible for the safeguarding of that child and will ensure that the placement is appropriate and meets the child's needs.

We recognise that children attending alternative provision may have complex needs and may be vulnerable to additional safeguarding risks. Safeguarding arrangements will therefore be considered before, during and throughout the placement.

Before a placement is agreed, the school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the provision. This includes confirmation that the provider will inform the school of any arrangements that may affect the child's safety, including relevant staffing changes, so the school can assure itself that appropriate safeguarding checks remain in place.

The Headteacher will ensure that appropriate due diligence and quality assurance is carried out before commissioning alternative provision and will continue to monitor whether the provision remains safe, suitable and able to meet the child's individual needs.

We will always know where a child is based during school hours. This includes keeping records of the address of the alternative provision provider and any subcontracted provision or satellite sites the child may attend.

Alternative provision placements will be reviewed regularly, at least half-termly, to provide assurance that the child is attending regularly, the placement remains safe, and the provision continues to meet the child's needs. Where safeguarding concerns arise, the placement will be reviewed immediately and will be suspended or ended, if necessary, unless and until concerns have been satisfactorily addressed.

The DSL will ensure appropriate safeguarding information is shared with the alternative provision provider, in line with information sharing, confidentiality and data protection requirements, so that the child can be safeguarded and supported effectively. The school will respond to any safeguarding concerns relating to a child attending alternative provision in line with this policy.

5.6 Elective Home Education (EHE)

We recognise that many home educated children have a positive learning experience, and that parents/carers may choose elective home education with their child's best education at the heart of the decision. The school also recognises that elective home education can mean some children are not in receipt of suitable education and may become less visible to the services that are there to keep them safe and supported.

Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with national Elective Home Education guidance, the School Attendance (Pupil Registration) (England) Regulations 2024 and local Kent guidance.

Where possible, we will work with the local authority, parents/carers and other key professionals to ensure that the implications of elective home education have been considered before a final decision is made and that decisions are made in the best interests of the child. This will be particularly important where the child has SEND, an Education, Health and Care plan, has or is known to partner agencies, or is otherwise vulnerable.

We will consider local guidance and tools, including the KSCMP EHE Leavers Checklist, to support proportionate safeguarding checks, information sharing and decision-making before a child is removed from roll. This will include considering the child's lived experience, any existing safeguarding or welfare concerns, parental responsibility arrangements, SEND or EHCP needs, young carer status, attendance, and whether further advice or a Request for Support is required.

Where there are safeguarding or welfare concerns, the DSL will consider whether a Request for Support is required.

5.7 Children who need a social worker (child in need and child protection plans)

We recognise that children may need a social worker due to safeguarding or welfare needs, including abuse, neglect, exploitation or complex family circumstances.

The DSL will hold and use information about children who need or have a social worker so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where a child needs or has a social worker, this will inform school decisions about safeguarding and welfare. This may include responding to unauthorised absence, children absent from or missing education, behaviour, pastoral support, academic support and any wider safeguarding risks within the family or community.

Where appropriate, information will be shared with relevant staff on a need-to-know basis so that the child can be safeguarded and supported effectively.

5.8 Looked after children, children in kinship care, previously looked after children and care leavers

We recognise that the most common reason for children becoming looked after is abuse and/or neglect, and that looked after and previously looked after children may remain vulnerable. Where safeguarding concerns arise for children who are looked after, previously looked after, in kinship care or leaving care, the school will ensure safeguarding action is considered alongside existing care planning, education planning and support arrangements.

The school has appointed a designated teacher: Mr Joe Cumber, Assistant Headteacher and Miss Lavender, Safeguarding manager. The designated teacher will work with local authorities, including Virtual School Kent, to promote the educational achievement of registered pupils who are looked after or who have been previously looked after, including those in kinship care.

The designated teacher will work closely with the DSL team to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the local authority.

Where a child is looked after, the DSL will hold details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

Where a child is a care leaver, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any safeguarding or welfare concerns.

5.9 Young carers

We recognise that young carers may have caring responsibilities for a family member with a long-term illness, disability, mental health need, substance misuse issue or other care need. We will be alert to the needs of young carers, recognising that caring responsibilities can impact on a child's attendance, attainment, behaviour, emotional wellbeing, relationships and ability to participate fully in school life.

Early identification is important to ensure young carers receive support at the right time and from the appropriate services. Staff will remain alert to indicators that a child may be a young carer, including changes in attendance, punctuality, concentration, tiredness, homework completion, emotional wellbeing, social relationships or increased responsibilities at home. If staff are concerned that a child may be a young carer, or that caring responsibilities may be affecting their safety, welfare or wellbeing, they will report this to the DSL.

The DSL will consider what support may be required, including pastoral support within school, reasonable adjustments, support with attendance or learning, and whether advice or support should be sought from external partners, local authority services, health services or young carers services.

Where caring responsibilities appear to be inappropriate, excessive, unsafe, or are having a significant impact on the child's welfare, the DSL will consider whether a Request for Support should be made.

Support for young carers is currently available through:

- Imago Young Carers, who provide information, advice, signposting and support for young carers, families and professionals.
- Our Young Carers Lead Mr Cumber and Miss Lavender. They are located in S21 and the safeguarding office.

5.10 Children who are privately fostered

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Where private fostering arrangements come to the attention of the school, for example, through the normal course of their interaction and promotion of learning activities with children, we must notify Kent Front Door Service in line with the local KSCMP arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

5.11 Children who are Lesbian, Gay or Bisexual (LGB)

We recognise that a child being lesbian, gay or bisexual is not in itself a risk factor for harm. However, children who are lesbian, gay or bisexual can sometimes be vulnerable to discriminatory bullying, prejudice, harassment or child-on-child abuse. We also recognise that children who are perceived by others to be lesbian, gay or bisexual, whether they are or not, can be just as vulnerable as children who are.

Staff will be alert to the possibility that children who are lesbian, gay or bisexual, or perceived to be, may face additional barriers to sharing concerns, particularly where they do not have a trusted adult they can speak to openly.

We will take steps to prevent and respond to discriminatory bullying, prejudice and harmful behaviour, including through our safeguarding, behaviour, anti-bullying, curriculum and pastoral arrangements. Where appropriate, sanctions and support will be considered in line with relevant school policies.

We will provide a safe, inclusive and trusted environment where children can speak openly, share concerns and be taken seriously. Concerns will be reported to the DSL in line with this policy.

Appropriate education will be provided through our Relationships Education/Relationships and Sex Education and Health Education curriculum to support respectful relationships, inclusion and the prevention of prejudice-based bullying.

5.12 Children who are questioning their gender

We recognise that some children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. We recognise that children may express themselves in ways that are less typically associated with their sex, and this is not in itself a safeguarding concern. Staff will avoid making assumptions based on appearance, behaviour, interests or presentation.

We will be a respectful environment where bullying, harassment, discrimination and harmful behaviour are not tolerated. Staff will be alert to the potential vulnerabilities of children who are questioning their gender, including bullying, family difficulties, online harm, mental health concerns, psychosocial needs or wider safeguarding concerns.

Staff will take time to listen to and understand the child's thoughts, feelings and experiences. Staff will remain professionally curious and consider the full context of the child's lived experience, including relationships with family, peers and the wider school environment.

We will respond to children who are questioning their gender in line with KCSIE, ensuring that any support is considered as part of the Trust's wider safeguarding responsibilities and with the child's welfare and best interests as a central consideration. The school will take a careful, considered and recorded approach, recognising that children's individual circumstances, needs and experiences will vary.

We will not make assumptions or initiate action regarding social transition. Where a child is questioning their gender, staff will respond sensitively, listen to the child's views and experiences, and consider any support needs or safeguarding concerns in line with this policy.

Where a child speaks to a member of staff about questioning their gender but does not ask the school to make changes to how they are treated, staff will not normally break confidence unless there is a related safeguarding concern. Where a conversation raises concerns about the child's wellbeing or safety, staff will follow this policy and speak to the DSL.

Parents/carers will usually be involved as a matter of priority where a child requests support relating to social transition. Their views will be treated with importance and properly considered. In the rare circumstances where involving parents/carers may place the child at greater risk of harm, the DSL will be involved before parents/carers are contacted or any decisions are made.

Where a child and their parents/carers requests support or changes in relation to social transition, this request should be made in writing to the Headteacher who will liaise with the Chief Executive Officer (CEO) for advice, taking account of KCSIE, safeguarding duties, equality and human rights obligations, advice from the Diocese and relevant Trust policies.

When considering any requests for support with social transition, the school will ensure our decision-making process is documented and records are kept.

We will be particularly alert to the vulnerabilities of children who have socially transitioned from an early age, including where their biological sex may not be known to peers or some staff. The DSL will be involved in these cases, particularly where support, safeguarding or wellbeing concerns arise as the child approaches or experiences puberty. Any information will be handled sensitively and recorded appropriately.

Any decision-making will be child-centred and safeguarding-led. The school will consider what is in the best interests of the child, while also taking account of the safety, welfare, rights and needs of other children who may be affected. The child's voice and lived experience will always be carefully considered, however any agreed response may not always be the same as the child's wishes.

The DSL and relevant senior leaders will be involved in considering any request for support relating to social transition. The school may also consider relevant advice from parents/carers, clinical professionals, the SENCO, mental health lead, pastoral staff or other appropriate professionals, depending on the child's circumstances.

We will take a careful approach when considering any request relating to social transition, recognising that such decisions may have significant implications for the child and others affected, and that arrangements may need to remain flexible and open to review.

Any requests or issues relating to names, pronouns, uniform, toilets, changing rooms, residential accommodation, sport, trips or other school arrangements will be considered through the school's agreed process and in line with KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies.

We will ensure that records are accurate and that relevant staff have the information they need to safeguard and support the child. Information will be shared on a need-to-know basis and managed in line with confidentiality, data protection and safeguarding requirements.

The school will keep any agreed arrangements under review, recognising that a child's circumstances, wishes or needs may change over time. This includes where new safeguarding information becomes known, where a child wishes to change or reverse previous arrangements, or where arrangements may no longer be meeting the child's needs or the needs of others affected.

If staff have any concerns about a child who is questioning their gender, including concerns about bullying, mental health, family response, online harm, self-harm, exploitation or any other safeguarding issue, they will report these to the DSL in line with this policy.

Where a safeguarding or welfare concern is identified, the DSL will consider whether a Request for Support should be made.

5.12 Transitional safeguarding for young people aged 18+

We recognise that safeguarding needs do not automatically end when a young person turns 18. Young people aged 18 and over may continue to experience, or be at risk of, abuse, neglect, exploitation, coercion, self-neglect, homelessness, domestic abuse, mental health crisis or other forms of harm.

Where a safeguarding or welfare concern relates to a young person aged 18 or over, staff will report the concern to the DSL. The DSL will consider the concern in line with relevant safeguarding procedures, the young person's wishes and views, mental capacity, consent, risk, and the need to share information to prevent or respond to harm.

The DSL will consider which pathway is most appropriate. This may include support within school, adult safeguarding, health, mental health, housing, police, Prevent or other relevant local services.

- Where appropriate, referrals will be made to adult social care in line local adult safeguarding referral pathways, with reference to guidance and resources from the Kent and Medway Safeguarding Adults Board.
- Where the young person is already known to children's services, is a care leaver, has an Education, Health and Care plan, has care and support needs, or is moving between services, the school will

consider how information can be shared appropriately to support continuity of safeguarding and support.
- Where there is an immediate risk of harm, emergency services will be contacted using 999. Safeguarding decisions and the rationale for actions taken or not taken will be recorded.

6 Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Trust recognises that online safety is an essential part of safeguarding and will adopt a whole school approach to online safety which empowers, protects, and educates pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The Trust recognises that the use of technology presents challenges and risks to children and adults both inside and outside of the school and that technology is a significant component in many safeguarding and well-being issues, and online abuse often occurs alongside face-to-face abuse.

Online safety is considered a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL, and parental engagement.

The Trust approach to online safety is based on addressing the following categories of risk:
- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, including fake news, and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this: for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images, including those generated by AI and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Staff will maintain an attitude of “it could happen here” in relation to online harm. Any concerns about a child’s online safety, digital activity or technology use will be reported to the DSL in line with this policy.

The Trust Executive and school leadership team will ensure that online safety is reflected within the school’s safeguarding arrangements and that appropriate systems, policies, procedures, training and monitoring are in place. Staff will receive training at induction, regularly updated, on online safety.

The DSL has responsibility for online safety within the school including understanding the filtering and monitoring systems and processes in place. The DSL will work with senior leaders, IT staff/providers, curriculum leads and other relevant staff to ensure online safety concerns are recognised, reported and responded to appropriately.

The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy, Social Media policy and behaviour policies**.**
- Internal sanctions and/or support will be implemented as appropriate.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

We use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.

All school owned devices and systems will be used in accordance with relevant policies, including but not limited to the Trust's acceptable use policy, staff code of conduct and information security policy, and with appropriate safety and security measures in place. The school has an Online Safety policy which sets out in detail the school's approach, this can be found on the school website.

6.1 Generative Artificial Intelligence (AI)

The Trust recognises that generative artificial intelligence (AI) tools can support teaching, learning, communication and administrative tasks when used safely, lawfully and appropriately. However, AI can also create safeguarding, data protection, privacy, intellectual property, academic integrity and information security risks. These include, but are not limited to:

- exposure to inappropriate or harmful content, including bullying, harassment, abuse and exploitation
- the creation or sharing of AI-generated or digitally manipulated images
- privacy and data protection breaches/risks
- intellectual property infringements
- academic integrity challenges such as plagiarism and cheating
- exposure to inaccurate, misleading, or biased content.

The Trust's AI policy sets out the Trust's expectations regarding the use of AI. This includes an approved list of AI tools that can be used and for what purpose. The Trust will not permit the use of generative AI tools for work and/or educational purposes unless they have been approved by the Trust or school following appropriate risk assessment and, where required, a Data Protection Impact Assessment (DPIA). The risk assessment will evaluate whether the tool meets the DfE generative AI product safety standards expectations and will consider safeguarding, data protection, privacy, confidentiality, age and ability of users, content risks, bias and accuracy, intellectual property, academic integrity, information security and how use will be monitored or reviewed.

AI tools that record, transcribe, summarise or generate notes from meetings, lessons, training or online discussions must only be used where approved by the school and in line with safeguarding, confidentiality, consent, data protection and acceptable use arrangements. All participants will be made aware where such tools are being used and how any information will be captured, used, stored and shared.

The Trust recognises that the use of images online, including through AI tools, can create safeguarding, privacy and data protection risks for children and staff. Images of pupils or staff must not be uploaded to, generated by, edited in, or shared through AI tools unless risk assessed and approved by the school. Any taking or publishing of images of pupils or staff will always be in line with our image use, consent, acceptable use, data protection and safeguarding arrangements.

Expectations about the safe and appropriate use of AI are set out in our acceptable use arrangements. We will respond to any misuse of AI in line with relevant policies.

Concerns involving AI-generated or digitally manipulated content, including nude or semi-nude imagery, harmful impersonation, bullying, harassment, abuse or exploitation, will be reported to the DSL and responded to in line with this policy.

Where the school believe that AI tools may have facilitated the creation of Child Sexual Abuse Material (CSAM), the school will respond in line with this policy, local safeguarding procedures, the UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' and national guidance from the IWF and NCA-CEOP as appropriate.

Where the school believe that AI tools may have facilitated harassment, including the deep fake abuse of adults, advice and support will be provided to individuals affected, such as via Unions, Professionals Online Safety Helpline or Report Harmful Content and/or if a crime has been committed, via the police. Where this involves staff, actions will be in line with the DfE Preventing and tackling bullying and harassment of school

staff. Action will also be taken in line with relevant school policies.

6.2 Mobile and Smart Devices

The Trust recognises the safeguarding risks that can be posed by mobile phones, smart devices and wearable technology. This includes devices that can send or receive messages or notifications, connect to mobile networks or the internet, record images, audio or video, or share location information, and may include but is not limited to, devices with built-in mobile connectivity, smart phones, smart watches, smart glasses, fitness trackers and other wearable technology.

Our wider approach to mobile phones, smart devices and wearable technology, including expectations for pupils/students, staff, visitors and parents/carers, is set out in our mobile phone policy which can be found on the school website.

We will operate in line with the expectation that schools are mobile phone-free environments by default. Pupils will not have access to mobile phones during the school day, including during lessons, transition times, breaktimes and lunchtimes, except where an agreed exception applies. Any exceptions will be determined by the school leadership team in line with safeguarding, behaviour, accessibility, reasonable adjustment and considerations around individual need, and will be set out in the school mobile phone policy.

We recognise that while restrictions on mobile phone use, including operating mobile-free environments, can help to manage safeguarding risks, such measures are most effective when embedded within a wider safeguarding and behaviour framework. Clear, proportionate and consistently applied expectations, alongside education that promotes safe and respectful online behaviour, strong and supportive relationships and robust safeguarding and anti-bullying policies, are essential to support safe and appropriate use.

Safeguarding concerns involving mobile phones, smart devices and wearable technology may arise outside of school, but still affect children's safety, wellbeing, relationships, attendance or learning. Such concerns will be reported to the DSL and responded to in line with this policy.

We will ensure that mobile phone and smart technology expectations do not discourage pupils from disclosing safeguarding concerns. Where a pupil needs to report messages, images, videos, posts or other content as part of reporting a concern, staff will respond in line with this policy, avoid viewing or sharing illegal or harmful content unnecessarily, and report the concern to the DSL.

6.3 Appropriate filtering and monitoring on school devices and networks

The Trust will do all that it reasonably can to limit children's exposure to online harms through school devices, systems, platforms and networks. In line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.

Filtering and monitoring are part of our wider safeguarding approach and will be supported by effective supervision, staff training, clear policies, curriculum education, regular risk assessment and timely response to concerns.

The Trust recognises the distinction between filtering and monitoring. Filtering is preventative and controls access to illegal, inappropriate or harmful content and services. Monitoring observes and reports on user activity to support safeguarding intervention where concerns are identified.

Filtering and monitoring arrangements will be informed by the school's safeguarding risk profile. This will include the age and ability of children, children who may be at greater risk of harm, how often children access technology, the devices and systems used, remote access arrangements, any use of personal devices, and the risks identified through the Prevent duty risk assessment.

The Trust recognises that filtering and monitoring must be effective in real-world use and not limited to traditional web browsing and will seek to ensure application of appropriate filtering and monitoring across websites, apps, cloud services, embedded browsers, mobile devices, remote access and generative AI tools, including any technical limitations.

When implementing appropriate filtering and monitoring, the Trust will ensure that systems are configured to help protect children from illegal, inappropriate and harmful content, while avoiding unreasonable restrictions that could limit what children can be taught about online safety, safeguarding and the safe use of technology.

Filtering and monitoring form an important part of our online safety and safeguarding responsibilities, but they are not a standalone solution. The Trust recognises that we cannot rely on filtering and monitoring alone to safeguard pupils. Effective safeguarding practice, clear policies and procedures, appropriate supervision, classroom and behaviour management, staff training, and regular education about safe and responsible technology use are all essential.

Pupils will use search tools, apps, online resources and digital platforms that are appropriate to their age, ability and needs. These will be selected by staff following an informed consideration of safeguarding, educational value, data protection and privacy requirements.

- Pupils will use Google or Edge as search engines, and use the suite of Office 365 apps for a range of online tasks. The AI tool available to pupils is Microsoft Copilot

Internet and technology use will be supervised by staff in a way that is appropriate to pupils age, ability, needs and potential risk of harm.

6.3.1 Responsibilities

The Trust has overall strategic responsibility for ensuring that appropriate filtering and monitoring systems and processes are in place as part of the school's wider safeguarding arrangements. This includes ensuring that filtering and monitoring provision is reviewed, that roles and responsibilities are clear, and that leaders and relevant staff understand how to manage systems effectively and escalate safeguarding concerns when identified.

The lead DSL has operational responsibility for filtering and monitoring and will work with The Trust to ensure there is oversight of the school's approach to meeting the DfE Filtering and monitoring standards.

The school's Online Safety policy sets out responsibilities in detail.

All staff will receive information about filtering and monitoring as part of induction and ongoing safeguarding training. This will include their responsibilities for reporting concerns, responding to incidents, following acceptable use expectations and escalating concerns where filtering or monitoring may not be working effectively.

All staff, pupils and parents/carers are expected to follow this policy, the school's online safety policy, acceptable use policies and to report any filtering or monitoring concerns.

6.3.2 Decision making and reviewing our filtering and monitoring provision

When procuring or making decisions about filtering and monitoring provision, The Trust will work closely with the DSLs to ensure systems are appropriate to the Trust's needs and circumstances.

Decisions about filtering and monitoring will be informed by the school's safeguarding risk profile. This will include consideration of:

- the age and ability of pupils
- children who may be at greater risk of harm
- how often pupils access technology

- our local context, including contextual safeguarding concerns
- the devices, systems, platforms and networks in use
- remote access arrangements
- any use of Bring Your Own Devices (BYOD)
- the school's Prevent duty risk assessment
- emerging risks, including mobile platforms, apps, cloud services and generative AI.

Decisions about what is blocked or allowed, and the rationale for those decisions, will be recorded. Any changes to filtering and monitoring arrangements will be assessed by staff with appropriate safeguarding, educational and technical knowledge and approved by the leadership team. Changes will be logged and recorded.

Reviews of filtering and monitoring provision will be carried out at least once every academic year by the senior leadership team member responsible for filtering and monitoring, with support from the lead DSL. Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.

- Reviews will consider whether filtering and monitoring remain effective across all relevant devices, systems and locations, including school-owned devices, mobile devices, apps, embedded browsers, cloud services, remote access, guest access and any permitted personal device use.
- Filtering and monitoring arrangements will be reviewed earlier than the annual review where there is a safeguarding concern, a change in technology or working practice, the introduction of new systems or devices, changes to remote access or personal device arrangements, or updates to local or national guidance.
- Impero provides live tracking of our filtering and monitoring incidents, should an issue arise, the Lead DSL will complete an immediate review and appropriate actions will be put in place.

We will also undertake regular and active checks on filtering and monitoring systems to ensure they are working effectively in practice and as expected.

- These checks will be recorded and used to provide assurance to the Trust Board that filtering and monitoring arrangements remain appropriate, effective and aligned with safeguarding responsibilities.

- Checks will be undertaken from both a safeguarding and technical perspective and will consider the school context and risk profile. This may include checking different devices, accounts, user groups, filtering policies, locations, apps, mobile devices, remote access arrangements and AI tools, where relevant.

- weekly, monthly, and termly checks, being undertaken by the DSL Team

- checks are undertaken with two members of staff present – A member of the DSL team and a member of the IT team.

- checks are undertaken in a location where confidentiality can be achieved,

- checks are undertaken on a range of devices/accounts to test different filtering policies

- checks are logged/recorded on Impero

- any technical concerns are flagged to the IT staff/IT service provider and safeguarding concerns are actioned by the DSL etc. in line with this policy.

Any technical concerns identified through checks or reviews will be escalated to IT staff. Any safeguarding concerns identified will be reported to the DSL and responded to in line with this policy.

6.3.3 Appropriate filtering

The school's education internet connectivity is provided through BCTec and we use LGFL to block access to harmful content.

LGFL blocks school provided internet access to illegal content and activity as identified in the Online Safety Act, including:

- Child Sexual Abuse Material (CSAM)
- Controlling or coercive behaviour
- Extreme sexual violence
- Extreme pornography
- Fraud
- Racially or religiously aggravated public order offences
- Inciting violence
- Illegal immigration and people smuggling
- Promoting or facilitating suicide
- Intimate image abuse
- Selling illegal drugs or weapons
- Sexual exploitation
- Terrorism

LGFL is a member of Internet Watch Foundation (IWF) and uses IWF services to block access to CSAM.

LGFL has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU).

LGFL blocks school provided internet access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content or activity which [promotes hate speech or discrimination, gambling, harmful bullying content, malware/hacking, misinformation, disinformation, privacy and copyright theft, pornography, self-harm and eating disorders and/or violence against women and girls.

Our filtering system is operational, up to date and applied to all users, including guest accounts, all school owned or provided devices, systems and networks, and all devices using the school internet connection. This is achieved by:

- Explain how appropriate filtering is in place for all school provided devices and access to any school systems, including offsite access, mobile devices, apps, cloud services and use of generative AI systems within the school.
- Include any specific filtering approaches required for mobile devices, such as tablets, eReaders, apps and embedded browsers, as approaches for these systems may differ.
- Filtering systems should, where possible, allow settings to identify device names or IDs, IP addresses, individual users, the time and date of attempted access, and the search term or content being blocked.
- If the school allows visitors, staff and/or pupils to bring and use personal devices to access school provided internet or systems, additional filtering arrangements should be detailed here.

The DSL and leadership team will work with LGFL and BCTec as appropriate and as identified in section 6.3.2, to ensure that our filtering policy is checked and reviewed to reflect our needs, risks and requirements.

If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:

- turn off monitor/screen, use a screen cover widget, report the concern immediately to a member of staff, report the URL/site/app to IT staff and DSL.

Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.

Parents/carers will be informed of filtering breaches involving their child, unless to do so would put a child at risk of harm or compromise a criminal investigation.

Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies. This may include but is not limited to the Internet Watch Foundation (where there are concerns about child sexual abuse material), Kent Police, NCA-CEOP, the Local Authority Designated Officer (LADO) or Front Door Service.

If staff are teaching topics which could create unusual activity, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

6.3.4 Appropriate monitoring

We will appropriately monitor the use of all school provided devices and networks to detect safeguarding risks in real or near-real time, including accessing or attempting to access, or engaging with or attempting to engage with illegal and/or harmful/inappropriate content or activity by any user. This is achieved by:

- physical monitoring (supervision), monitoring internet and web access and active technology monitoring services.

In accordance with our mobile phone policy, the Trust has clear expectations regarding the use of personal mobile phones and smart devices by staff, visitors and pupils. Where personal devices of staff and/or visitors are permitted to access school systems or networks, the school will consider how filtering and monitoring applies in line with safeguarding, data protection, human rights and privacy requirements.

- *In accordance with DfE Mobile phones in schools guidance, BYOD arrangements should not include mobile phones. Expectations regarding mobile phones and smart devices should be set out in the school mobile phone and smart technology policy. If Bring Your Own Device (BYOD) arrangements are permitted for learning devices such as laptops or tablets, explain how filtering and monitoring applies to those devices when accessing school systems or networks.*

All users will be informed that use of our devices, systems and networks can/will be monitored and that monitoring will be carried out in line with safeguarding, data protection, human rights and privacy legislation.

Monitoring systems and processes will be supported by sufficient staff capacity, appropriate safeguarding expertise and clear processes to review, prioritise and act on alerts or reports.

If a concern is identified via our monitoring approaches:

- Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
- Where the concern relates to staff, it will be reported to the headteacher (or Trust CEO if the concern relates to the headteacher), in line with our staff allegations policy.
- where the concern relates to a technical issue or system limitation, it will be reported to the KCSP Head of IT

Parents/carers will be informed of safeguarding concerns involving their child identified through our monitoring approaches, unless to do so would put a child at risk of harm or compromise a criminal investigation.

Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies. This may include, but is not limited to, the emergency services via 999, Kent Police, NCA-CEOP , LADO or Front Door Service.

6.4 Information security and access management

The Trust recognises that information security and access management are part of our wider safeguarding responsibilities. Appropriate security measures will be in place to help protect children, staff, systems, personal information and safeguarding records.

The Trust will take appropriate action to strengthen cyber security, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks, in line with the DfE Cyber security standards for schools and colleges and relevant data protection law requirements.

The Trust will ensure expectations are in place for secure access to systems and information. This includes arrangements relating to passwords, account access, user permissions, multi-factor authentication where applicable, use of school systems, secure storage of information, reporting concerns and responding to incidents.

The Lead DSL will review the effectiveness of information security, access management and cyber security arrangements periodically, and in response to cyber incidents, data breaches, system changes, technology developments or updates to national guidance.

The Lead DSL and Headteacher are responsible for ensuring that our school has met the DfE cyber security standards for schools. Staff will report concerns about data breaches, cyber security incidents, inappropriate access to systems, lost or stolen devices, compromised accounts, phishing, malware or risks to safeguarding information in line with school procedures.

6.5 Remote learning

Where school provides remote learning, it will be delivered in line with safeguarding, privacy, data protection, acceptable use and online safety requirements.

Remote learning will take place through school approved systems and channels, via Microsoft 365, Sparx Reader and Tassamoi.

Staff and pupils will engage with remote learning in line with existing expectations for behaviour, staff conduct, safeguarding and acceptable use. Staff will only use school approved platforms, accounts and communication methods when delivering remote learning or communicating with pupils and families. Any exceptional circumstances which mean this cannot be followed must be discussed with the DSL and/or senior leadership.

Pupils, parents/carers and staff will be encouraged to report concerns or issues that arise during remote or online learning. Concerns will be responded to in line with this policy and other relevant school procedures.

Where remote learning raises a safeguarding or welfare concern, staff will report this to the DSL in line with this policy. The DSL will consider whether a Request for Support should be made.

Further expectations for remote learning are set out in our acceptable use policy/remote learning acceptable use arrangements/online learning procedures.

6.6 Online Safety Training for Staff

The Trust will ensure that online safety is included within safeguarding and child protection training for all staff, including at induction and through regular updates. Training and updates will include staff roles and responsibilities in relation to online safety, including filtering and monitoring, acceptable use, reporting concerns and responding to online safety incidents.

Online safety training will be integrated into the school's wider safeguarding training arrangements. Further information is set out in section 7 of this policy.

6.7 Educating pupils

The Lead DSL will ensure that pupils receive age and ability appropriate education to help them understand online risks and how to stay safe online. Online safety education will support pupils to understand safe and respectful use of technology, including content, contact, conduct and commerce risks, reporting concerns and seeking help.

Online safety will be addressed through the curriculum and wider safeguarding education, including PSHE/RSHE and other appropriate opportunities. Further information is set out in section 9 of this policy.

6.8 Working with parents/carers

The DSL team will work in partnership with parents/carers to support children's online safety. We will use appropriate communication channels to reinforce the importance of children being safe online and to share information about online risks, safe technology use, reporting routes and how parents/carers can support children at home, for example through the school website, newsletters, parent/carer events, curriculum information, official social media, safeguarding updates or other communication channels.

The DSL team will ensure parents/carers are provided with clear information about the school's online safety arrangements. This will include, where appropriate, information about filtering and monitoring systems, what children are being asked to do online, the sites, platforms or services they may be asked to access, and who from the school, if anyone, their child may interact with online, for example through acceptable use arrangements, home/school agreements, curriculum information, the school website, parent/carer communications or relevant policy documents.

Parents/carers will usually be informed and involved where online safety concerns arise involving their child, unless doing so may place a child at increased risk of harm or could undermine a police or statutory safeguarding response.

Where the DSL team becomes aware of potentially harmful online risks, challenges, hoaxes or trends, we will respond in a proportionate and safeguarding-led way. Communications with children, staff and parents/carers will aim to provide clear, helpful advice without unnecessarily amplifying harmful content or creating avoidable anxiety.

6.9 Reviewing online safety

The Trust recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will review its approach to online safety at least annually, supported by a risk assessment which considers and reflects the current online risks faced by pupils.

The review will consider the effectiveness of the school's wider online safety arrangements, including policies and procedures, staff training, curriculum, pupil voice, parental engagement, incident records, filtering and monitoring assurance, mobile and smart technology, artificial intelligence, remote learning and information security.

The Trust, leadership team and DSL will use the outcomes of online safety reviews to identify strengths, address gaps and improve the school's approach to keeping children safe online.

7 Staff Engagement and Expectations

7.1 Staff awareness, induction and training

All staff

All staff and volunteers (including local governance committee members, directors and clergy) will be given an appropriate level of safeguarding training. Training will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff-training, and curriculum planning.

Training (including induction training) – is mandatory. Confirmation must be recorded and must include:

- This child protection and safeguarding policy
- School behaviour policy
- Physical Intervention or Positive Handling policy
- Online safety
- staff code of conduct
- the safeguarding response to children who are absent from school; and
- Part One of KCSIE 2026 for school leaders and all members of staff who work directly with children and young people
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies) see KCSIE 2026
- training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being involved with or supporting terrorism and to challenge extremist ideas.

Training for teachers will have regard to the Teachers' Standards to support the expectation that all teachers:

- manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

This will include internal responsibilities within a school, child protection processes, how to recognise and respond to signs and symptoms of concern and abuse and safe working practice. Training is organised by the Headteacher and DSL in line with Trust, government, local and diocesan guidance that currently requires this to be updated annually.

Online Safeguarding training is available via The Key and can be arranged by the DSL.

The Trust Lead Safeguarding Officer, Education Directors, Area School Improvement Partners, Headteachers and DSLs (including Deputies) will:

- undertake the required DSL safeguarding training when they first take up the role and continue to update their knowledge on an on-going basis and at least every 2 years as required by guidance.
- update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- undertake Prevent awareness training.

The Trust Safeguarding Director and Governance Committee Safeguarding Lead will:

- receive safeguarding training upon commencement of their role and then on an annual basis. The Training is available via The Key and must be accessed by individuals themselves

Trust Directors and Governance Committee members

- will receive annual training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. Online training is available via The Key and can be accessed by individuals themselves.

7.2 Safer working practice

The Trust will take steps, through this policy and other relevant school policies and procedures, to promote a culture of continuous vigilance, deter and prevent abuse, and ensure that inappropriate or unsafe behaviour is challenged and responded to appropriately.

All staff, volunteers, contractors, agency and third-party staff are expected to work within clear expectations for safe and professional conduct, as set out in the school staff code of conduct, acceptable use arrangements and other relevant policies. This includes expectations relating to professional boundaries, communication with children and families, physical contact, one-to-one working, confidentiality, information sharing, use of technology, social media, mobile and smart devices, and reporting concerns about the conduct of adults.

Staff will be made aware of the school procedures for reporting and responding to concerns about adults working with children, including allegations, low-level concerns and whistleblowing. Concerns will be managed in line with the relevant sections of this policy and the school code of conduct.

Staff will be made aware of the school behaviour management and restrictive intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical intervention and/or use of reasonable force will be in line with our agreed policy, procedures and national guidance.

All staff will be made aware of the professional risks associated with the use of social media, personal devices and electronic communication, including email, mobile phones, messaging, texting and social networking. Staff will follow relevant policies, including the staff staff code of conduct, acceptable use arrangements, mobile and smart technology policy, social media policy and data protection procedures.

7.3 Supervision and support

The school will provide appropriate supervision, guidance and support for staff so that they are able to fulfil their safeguarding responsibilities effectively. The school will ensure that staff are supported to understand and carry out their responsibilities for safeguarding and promoting the welfare of children, including knowing when and how to seek advice from the DSL. Staff will be supported by the DSL in their safeguarding role, including through advice, guidance, debriefing and opportunities to discuss concerns where appropriate.

The Trust recognises that safeguarding work can be complex and emotionally demanding. Any member of staff affected by issues arising from concerns about children's welfare or safety can seek support from the DSL, headteacher or other appropriate senior leader.

Where appropriate, the DSL or senior leaders may signpost staff to external sources of professional support. Staff may also seek support directly from organisations such as their union or other relevant professional support services.

8 Safer Recruitment and Allegations Against Staff

8.2 Safer recruitment and safeguarding checks

The Trust is committed to ensuring that we develop a safe culture and that all reasonable steps are taken to recruit, engage and deploy staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff who are safe and suitable to work with or around children. We recognise that people working in or on behalf of the school must be suitable for their role, have the relevant qualifications, training and experience, and have completed any required safeguarding checks.

The Headteacher will follow Part three of Keeping Children Safe in Education and relevant guidance from the Disclosure and Barring Service when recruiting staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and others who may work with or around children. The Trust and school leadership team are responsible for ensuring that safe recruitment processes are followed in line with statutory guidance.

The Headteacher will ensure safer recruitment, safeguarding checks and related decision-making are carried out fairly, proportionately and in line with safeguarding duties, equality legislation and, where applicable, the Public Sector Equality Duty.

At least one person involved in conducting interviews will have completed safer recruitment training.

The Headteacher will maintain an accurate Single Central Record (SCR) in line with statutory guidance and the Trust SCR procedure document.

Where required, the Headteacher will ensure that relevant professional status, prohibition, restriction, sanction or direction checks, are carried out in line with Part three of KCSIE.

The Headteacher will consider and comply with relevant requirements relating to the Childcare Disqualification Regulations 2009 and obligations under the Childcare Act 2006, where applicable.

The Headteacher will determine whether roles, including volunteer roles, are regulated activity in line with KCSIE, DfE Regulated activity in relation to children: scope supporting guidance and relevant legislation. Appropriate safeguarding checks will be completed before individuals start work or volunteering, as required by statutory guidance.

All staff working in or on behalf of the school are expected to disclose any information that may affect their suitability to work with children. This may include convictions, cautions, court orders, reprimands, warnings or other relevant information and any information where their personal circumstances or associations may present a relevant safeguarding risk. This includes information arising during employment, not only at the point of recruitment. Any information shared will be considered proportionately and in line with safeguarding, HR, data protection and LADO guidance.

Where the Headteacher places a pupil with an alternative provision provider, we will obtain appropriate written safeguarding assurance from the provider before the placement starts. This will include confirmation that relevant safeguarding checks have been completed for individuals working at the provision. Further information about our safeguarding responsibilities for children attending alternative provision is set out in section 5.5 of this policy.

Where school organises work experience placements, we will follow the relevant advice and guidance in Part three of KCSIE, including consideration of supervision arrangements, safeguarding responsibilities and any checks required for adults involved in the placement.

8.3 Allegations or concerns about staff, including supply teachers, trainee teachers, volunteers and contractors

For specific guidance on how to respond to concerns or allegations against staff (including those not directly employed by the Trust) or volunteers, please refer to **Appendix 2 which sets out the Trust's Procedures for Managing Safeguarding Concerns and Allegations made about staff,** including supply teachers, other staff, volunteers and contractors.

The Headteacher will follow the procedures set out in Appendix 2 to manage any safeguarding concern or allegation, no matter how small, about any adult working in or on behalf of the school. This includes staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff or organisations working with children.

The Headteacher will respond to any concern or allegation about an adult working in or on behalf of the school in line with Part four of KCSIE and local Kent allegations management arrangements. This includes concerns or allegations that meet the 'harm threshold' and concerns that do not meet the harm threshold, sometimes referred to as 'low-level concerns'.

The Headteacher will work with relevant agencies, including the Local Authority Designated Officer (LADO) as appropriate. The LADO provides advice and oversight where concerns or allegations indicate that an adult working with children may have harmed a child, may pose a risk of harm to children, may have committed a criminal offence related to a child, or may not be suitable to work with children. In Kent, the LADO function is undertaken by the LADO Education Safeguarding Advisory Service (LESAS).

Concerns or allegations will be recorded and dealt with appropriately. Ensuring concerns are managed effectively protects children and also protects adults working in or on behalf of the school from potential false allegations, misunderstandings or unsafe practice going unaddressed.

If staff have a safeguarding concern or an allegation is made that another adult working in or on behalf of the school has harmed a child, may have harmed a child, or may pose a risk of harm to children, this will be referred to the Headteacher. The Headteacher will consider whether an onward referral to the LADO is required.

Where the concern is about the Headteacher, Area School Improvement Partners or members of the Trust Executive team these should be referred immediately to the Trust CEO who will contact the LADO.

In addition to necessary notification to the local authority in line with the above procedures, where an allegation is made against a member of the clergy or a member of a religious order, linked to an educational establishment, the case manager (as identified in Appendix 2) will also notify the Diocesan Safeguarding Officer who will take a lead role for the Diocese in any investigation.

Where the Headteacher is unsure how to respond, including where it is unclear whether a concern meets the harm threshold, advice will be sought from the LADO in line with local Kent arrangements.

Where a concern or allegation relates to a supply teacher, trainee teacher, contractor, volunteer, agency worker or other third-party member of staff, the Headteacher will liaise with the relevant employer, agency, training provider, contractor or other organisation as appropriate. The school recognises that safeguarding responsibilities are shared with the relevant third-party organisation; however, this does not remove the school's responsibility to take appropriate safeguarding action, record decisions and involve the LADO where the concern meets, or may meet, the harm threshold.

Where the concern relates to a trainee teacher, the school will consider the concern in line with Part four of KCSIE, local Kent allegations management arrangements and any relevant partnership arrangements with the training provider. Safeguarding action will not be delayed while responsibility for employment, placement or training arrangements is clarified.

After resolving or concluding allegations or low-level concerns about adults working in or on behalf of the school, the headteacher, and the LADO where involved, will consider whether there are lessons to be learned and whether any improvements are required to safeguarding practice, policy, training, supervision or safer working arrangements.

Where the school receives an allegation relating to an incident that happened when an individual or organisation was using our premises for activities with children, such as community groups, sports associations or service providers, we will follow our safeguarding policies and procedures and inform the LADO as appropriate.

8.3.1 Concerns that meet the 'harm threshold'

The Trust recognises that an allegation may meet the harm threshold where an adult working in or on behalf of the Trust/school has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations against staff which meet this threshold will be responded to and managed in line the Appendix 2 and with Part four of KCSIE, local Kent allegations management arrangements and the reporting process set out in section 8.2 above.

The school is responsible for deciding whether a Request for Support to the Front Door Service is required for the child or any other children affected. This may be discussed with the LADO as part of allegations management, but the school will not delay appropriate safeguarding action and will act in line with KSCMP procedures, the Kent Support Levels Guidance and section 3 of this policy.

If staff are concerned that appropriate safeguarding action is not being taken following an allegation about an adult working with children, they are advised to follow the Trust's whistleblowing procedure and/or to contact the LADO directly themselves.

8.3.2 Concerns that do not meet the 'harm threshold' – low-level concerns

The Trust recognises that concerns or allegations about adults working in or on behalf of the school which do not meet the harm threshold, sometimes referred to as low-level concerns, must still be shared, recorded and responded to appropriately in line with Part four of KCSIE and our staff code of conduct.

A low-level concern does not mean that the concern is insignificant. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with expected professional standards or the school staff code of conduct. This includes behaviour outside of work where this may affect the adult's suitability to work with children, and where the concern does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Low-level concerns may arise in a number of different ways, including through suspicion, complaint, disclosure, observation, allegations made by a child, parent/carer or adult, or information arising from vetting checks.

Appendix 2 sets out the Trust's procedure for managing low level concerns.

The school will promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are shared responsibly with the right person and dealt with promptly and appropriately. This helps identify inappropriate, problematic or concerning behaviour early, minimises the risk of abuse, and supports adults to understand and maintain appropriate professional boundaries.

Low-level concerns should be shared confidentially in line with the Trust's staff code of conduct to the Headteacher.

Any low-level concerns about the Headteachers or members of the Trust central team should be reported to the Trust CEO.

The Headteacher will be informed of all low-level concerns and is the ultimate decision-maker in respect of the response to low-level concerns. Where low-level concerns are initially reported to the DSL or another nominated person, they will be shared with the Headteacher in a timely manner.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, may appear compromising to others, or where, on reflection, they believe they may have behaved in a way that falls below expected professional standards.

Low-level concerns about supply teachers, trainee teachers, contractors, agency staff, volunteers or other third-party staff will be shared with their employer, agency, training provider or relevant organisation as appropriate, so that any potential patterns of concerning or inappropriate behaviour can be identified and appropriate action taken.

If the school is in any doubt as to whether a concern meets the harm threshold, advice will be sought from the LADO.

Low-level concerns will be recorded in writing on CPOMS StaffSafe. Records will include details of the concern, the context in which the concern arose, the action taken and the rationale for any decisions made. Records will be kept confidential, held securely and managed in line with data protection laws and school record retention procedures.

Low-level concern records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will consider appropriate action. This may include consulting with the LADO, taking advice from HR advice, reviewing safeguarding practice, providing additional training or supervision, revising relevant policies, or following disciplinary procedures.

The school will consider whether any wider cultural, supervision, training or policy issues may have enabled the behaviour to occur and will take appropriate action to reduce the risk of recurrence.

8.4 Safe Culture, including whistleblowing

As part of our approach to safeguarding, we will create and maintain a culture of openness, trust and transparency. Our values and expected behaviours, as set out in the Trust's staff code of conduct, will be lived, monitored and reinforced by all adults working in or on behalf of the Trust, including staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff.

All concerns about adults working in or on behalf of the Trust will be taken seriously, shared responsibly, recorded and dealt with promptly and appropriately. This includes concerns that meet, or may meet, the harm threshold and concerns that do not meet the harm threshold.

Staff are encouraged and should feel confident to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or where, on reflection, they believe they may have behaved in a way that falls below expected professional standards.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice, inappropriate behaviour, or potential failures in the Trust's or school's safeguarding arrangements. The leadership team at the school will take all concerns or allegations seriously.

All staff and volunteers need to be aware of the Trust Whistleblowing Policy and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. A copy of the Trust's Whistleblowing Policy is in all Safeguarding files and on the Trust and school's website.

Staff can access the NSPCC Whistleblowing Advice Line if they do not feel able to raise concerns about child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk. The NSPCC states that its Whistleblowing Advice Line supports people who are worried about how child protection issues are handled in their workplace.

The Trust has a legal duty to refer to the Disclosure and Barring Service (DBS) where a person has harmed, or poses a risk of harm, to a child, or where there is reason to believe they have committed one of the relevant offences and they have been removed from working in regulated activity, or would have been removed had they not left.

Where these circumstances arise in relation to a member of staff, volunteer or other adult working in or on behalf the school, a DBS referral will be made as soon as possible after resignation or removal, in accordance with statutory guidance and advice from the LADO and the Chief Executive Officer (or nominee).

Where a case involving concerns or allegations about an adult working in or on behalf of the Trust has been concluded, the Headteacher will consider whether there are lessons to be learned and whether improvements are required to safeguarding practice, safer working arrangements, staff training, supervision, policy or culture.

9 Opportunities to Teach Safeguarding

The Headteacher will ensure that pupils are taught about how to keep themselves and others safe, including online, as part of providing a broad and balanced curriculum. Relevant issues will be covered through Relationships and Sex Education and Health Education, tutorials, pastoral provision, curriculum opportunities and wider safeguarding education as appropriate to phase, age and statutory requirements.

The school recognises that we play an essential role in helping children to understand what safe and appropriate behaviour looks like, including in relationships with other children and adults. Our curriculum and wider safeguarding education will support pupils to recognise when they or others may not be safe, and how to seek advice, help and support.

Our curriculum provides opportunities to develop self-awareness, self-esteem, social and emotional understanding, assertiveness, decision-making and help-seeking skills, so that pupils have a range of age-appropriate strategies to support their own safety and the safety of others.

The Trust recognises the crucial role we have to play in preventative education. Preventative education is most effective as part of a whole school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence, sexual harassment, derogatory behaviour and other forms of physical violence or conflict.

The school has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life. These are underpinned by our behaviour policy, pastoral support arrangements and a planned programme of evidence-based Relationships and Sex Education and Health Education safeguarding education. This programme is delivered through regularly timetabled opportunities and reinforced through the wider curriculum and school life.

Our programme will be fully inclusive and age and stage of development appropriate. The Trust recognises that a one-size-fits-all approach will not be appropriate for all children, and that some pupils may need a more personalised or contextualised approach. This may include children who are victims of abuse, neglect or exploitation, children with SEND, children with a social worker, children who are care experienced, young carers and children who may be more vulnerable to online harm or child-on-child abuse.

Through the curriculum and wider safeguarding education, the school will support pupils to learn about relevant safeguarding themes in an age and ability appropriate way. This may include positive relationships and the skills that support them, healthy and respectful relationships, boundaries, consent and kindness in relationships, stereotyping, prejudice and equality, body confidence and self-esteem, recognising and reporting concerns about abusive relationships, including coercive and controlling behaviour, the concepts of, and laws relating to, sexual harassment, sexual violence and abuse, why sexual harassment and sexual violence are always unacceptable and never the fault of the person who has experienced it, online harms, including sharing images, nudes and semi-nudes, deepfakes, pornography, misogynistic influencers, online bullying, grooming, exploitation, misinformation, disinformation and how and where to access help and support.

Online safety will be addressed through the curriculum and safeguarding education approaches. This will support pupils to understand content, contact, conduct and commerce risks, safe and respectful use of technology, privacy, reporting concerns and where to get help. Further information about the school's wider online safety approach is set out in section 6 of this policy.

School systems will support children to speak to a range of trusted staff. All children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

The Trust recognises the value of external organisations and speakers in enriching safeguarding education. External organisations and speakers will be assessed before they are given access to pupils in line with the Trust's Visiting Speakers Protocols. This may include considering the educational value of the input, the age and ability appropriateness of content, alignment with school values and curriculum aims, any safeguarding considerations, and whether relevant checks or supervision arrangements are required.

When using external visitors or resources, the school will remain responsible for ensuring that safeguarding education is accurate, appropriate, inclusive and delivered in a way that supports children's safety and wellbeing.

10 Physical Safety

10.1 Restrictive Interventions, including the Use of 'Reasonable Force'

There may be circumstances when it is necessary for school staff to use restrictive interventions to safeguard children, staff or others from harm. This approach is informed by the DfE guidance Restrictive interventions, including the use of reasonable force in schools.

'Restrictive interventions' is an umbrella term that refers to any action, planned or reactive, that limits a pupil's movement, liberty or freedom. This includes, but is not limited to:

- the use of reasonable force.
- physical restraint.
- non force restrictive practices.
- seclusion, where a pupil is prevented from leaving a space for safety reasons.

The school is committed to minimising the need for restrictive interventions through positive behaviour support, early intervention and de-escalation strategies. Restrictive interventions will only be used when necessary, never as a punishment, and only where there is a real risk of harm. Any use of reasonable force will be lawful, necessary and proportionate. It will involve no more force than is necessary, will be used for the shortest possible time, and will depend on the individual circumstances.

Particular care will be taken when supporting pupils with SEND or other vulnerabilities, recognising that these pupils may be disproportionately affected. Reasonable adjustments and preventative approaches will be considered where appropriate.

In line with the DfE statutory guidance, all significant incidents involving restrictive interventions, including the use of reasonable force, restraint or seclusion, will be recorded in writing as soon as practicable and reported to parents/carers as soon as practicable, unless doing so would place a child at risk of harm or compromise a safeguarding or criminal investigation.

Records will be reviewed by school leaders and the local governance committee to support safeguarding oversight, identify patterns, consider any disproportionate impact and inform staff training, support and policy development. Further detail regarding behaviour management, de-escalation strategies, staff training and restrictive intervention can be found in the Behaviour Policy, Restrictive Intervention policy, SEND Policy and Staff Code of Conduct.

10.2 Safeguarding in physical spaces, sport and residential arrangements

The Trust recognises that safeguarding children includes ensuring that physical spaces, activities and accommodation arrangements are safe, appropriate and protect children's privacy, dignity and wellbeing. The school will consider its safeguarding duties alongside its obligations under equality and human rights legislation when making decisions about toilets, changing rooms, showers, sport, physical education, residential accommodation, educational visits and other physical arrangements.

Toilets, changing rooms, showers and other intimate or private spaces will be managed in line with KCSIE, relevant premises requirements, safeguarding duties and the school's local arrangements. The school will ensure that arrangements do not compromise the safety, comfort, privacy or dignity of any child.

Where a child requires an alternative arrangement in relation to toilets, changing rooms, showers, sport, residential accommodation or similar provision, the school will consider this through a careful, recorded and safeguarding-led process. This will include consideration of the child's needs and wishes, the safety and

welfare of other children, relevant legal duties, practical arrangements and any relevant guidance. Where the request relates to a child who is questioning their gender, this will be considered in line with section 5.12 of this policy.

Sport, PE and other physical activities will be organised with due regard to children's safety, fairness, supervision, privacy and individual needs. Where activities are organised by sex for reasons of safety, fairness or safeguarding, arrangements will be made in line with KCSIE, the Equality Act and relevant school policies.

Where the school arranges overnight visits, trips, camps, boarding, residential accommodation or similar activities, sleeping and accommodation arrangements will be risk assessed and planned to safeguard all children. This will include consideration of supervision, privacy, dignity, individual needs, SEND, medical needs, relationships between children, child-on-child abuse risks and any additional vulnerabilities.

Any decisions or individual arrangements made under this section will be recorded, reviewed as appropriate and shared with relevant staff on a need-to-know basis, in line with safeguarding, confidentiality and data protection requirements.

10.3 The use of school premises by other organisations

Where school facilities or premises are rented or hired out to organisations or individuals, for example to community groups, sports associations, and service providers to run community or extra-curricular activities, we will ensure that appropriate arrangements are in place to keep children safe. Where those services or activities are provided under the direct supervision or management of our school staff, our existing child protection and safeguarding arrangements, including this policy, will apply.

Where services or activities are provided separately by another organisation using the school facilities or premises, the Headteacher (or their nominee) will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place. This may include inspecting policies and procedures as needed.

The Headteacher will ensure that arrangements are in place for the provider to liaise with the school on safeguarding matters where appropriate. The Trust Model Lettings Policy and Agreement must be in place prior to the commencement of any lettings arrangement. If assurance is not achieved, an application to use the premises will be refused. If appropriate safeguarding assurance is not achieved, an application to use the premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement, such as a lease or hire agreement, as a condition of use and occupation of the premises. Failure to comply with safeguarding requirements may lead to termination of the agreement. Where the school receives an allegation relating to an incident that happened when an individual or organisation was using our premises for activities with children, we will follow safeguarding policies and procedures and inform the LADO as appropriate.

10.4 Site security

All members of staff have a responsibility for maintaining awareness of buildings and site security and for reporting concerns that may come to light.

The school will have arrangements in place to help keep children, staff and visitors safe on site.

- keeping gates and doors secure, not sharing door codes, wearing identification badges or lanyards, signing visitors in and out, supervision of contractors, and reporting site security concerns.

Appropriate checks and supervision will be undertaken in respect of visitors, volunteers and contractors coming into school as outlined within national guidance and local procedures.

- visitors signing in and out, displaying visitor badges, being escorted where appropriate, and arrangements for visitors without appropriate checks.

For visitors attending in a professional capacity from partner agencies, such as social workers, Family Help practitioners, health professionals, police officers or other professionals, the school will check their identity and purpose for visiting. The school will not routinely require these professionals to provide evidence of an individual DBS certificate before accessing children, as appropriate safeguarding checks are expected to have been undertaken by their employer. Where there are any concerns about identity, purpose, professional status or suitability, these will be clarified with the professional's employer or relevant agency before access is agreed, unless doing so would delay an urgent safeguarding response.

Any individual who is not known or identifiable on site should be challenged by staff for clarification and reassurance. Children will be encouraged to report any concerns about unknown or unidentified adults to a member of staff.

The school will not accept the behaviour of any individual, including parents/carers, visitors or members of the public, that threatens site security or causes children, staff or others to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access to the school site. Any site security concern which may indicate a safeguarding risk will be reported to the Headteacher and responded to in line with this policy.

11 Local Support

All members of staff are made aware of local support available.

- **Kent Family Help**
  - Kent Support level guidance: www.kscmp.org.uk/guidance/kent-support-levels-guidance
  - Make a Request for Support to the Front Door Service via Kent Integrated Children's Services Portal – select 'urgent' if there is an immediate risk/concern
  - Front Door Service Consultation: 03000 411111
  - Out of Hours Number: 03000 419191

- **Community Based Early Help and Family Hubs**
  - Early Help and Preventative Services - KELSI and Early Help contacts - KELSI
  - Kent Family Hubs - Kent County Council

- **Kent Police**
  - NPCC When to call the police - guidance for schools and colleges
  - Home | Kent Police
  - Telephone 101 or 999 if there is an immediate risk of harm
  - PCSO Sarah Stanley 46057996, sarah.stanley@kent.police.uk

- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - www.kscmp.org.uk
  - 03000 421126 or kscmp@kent.gov.uk

- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk
  - Kent and Medway Safeguarding Adults Board: Kent & Medway SAB website

- **Kent LADO Education Safeguarding Advisory Service (LESAS)**
  - Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership
    - To refer to the LADO, complete a referral on the Kent Integrated Children's Services Portal.
      - To enquire if a LADO referral should be made, please use the LESAS enquiry form.
      - For strategic education safeguarding or online safety advice, or to enquire about LESAS commissioned services/support, please use the LESAS enquiry form.

Appendix 1: Categories of Abuse

Abuse, neglect, harm and exploitation are rarely standalone events that can be covered by one definition or label. In many cases, multiple issues will overlap.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or by others. Abuse can be carried out both on and offline and can be perpetrated by men, women, and other children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Sexual abuse: involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the school's policy and procedures for dealing with it.

Signs that may indicate Sexual Abuse

- Sudden changes in behaviour and/or education performance.
- Depression/withdrawal.
- Regression to younger behaviour.
- Sexualised behaviour or displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation, attempts at suicide
- Fire setting.
- Alluding to secrets which they cannot reveal, secrecy relating to use of technology, or unexplained gifts or money.
- Clinginess and/or need for constant reassurance
- Distrust of familiar adults or anxiety about being left with specific people.
- Fear of undressing, for example for PE.
- Sexually transmitted infection or pregnancy.

The Centre of Expertise on Child Sexual Abuse provides resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

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

Signs that may indicate physical abuse

- Bruises, abrasions or injuries around the face, mouth, cheeks or soft areas of the body.
- Bi-lateral injuries, fingertip bruising, bite marks, strap marks, welts or injuries suggesting beatings.
- Burns or scalds, including unusual patterns, spread of injuries or deep contact burns such as cigarette burns.
- Injuries that cannot be accounted for, or explanations which are inadequate, inconsistent, excessively plausible, or where there is a delay in seeking treatment.
- Covering arms and legs even when hot.
- Inappropriate or harmful medication use.
- Aggressive behaviour or severe temper outbursts.

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

Signs that may indicate emotional abuse

- Overreaction to mistakes.
- Lack of self-confidence or self-esteem.
- Excessive need for approval, attention and affection.
- Sudden speech disorders.
- Unwillingness or inability to play.
- Extremes of passivity and/or aggression.
- Self-harm, eating disorders.
- Fear of parents being contacted.
- Compulsive stealing or drug, alcohol or solvent misuse.
- Secrecy relating to use of technology.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that may indicate neglect

- Constant hunger.
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing.
- Frequent lateness, non-attendance or running away.
- Untreated medical problems.
- Loss of weight/being constantly underweight.
- Poor relationships with peers, low self-esteem or withdrawn presentation.
- Compulsive stealing and/or scavenging.
- Rocking, hair twisting or thumb sucking.

Appendix 2: Procedures for managing safeguarding concerns and allegations about staff, including supply teachers, volunteers and contractors

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, supply teacher, volunteer or contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). We will deal with any allegations of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will be identified at the earliest opportunity to lead any investigation. The 'case manager' will normally be:

- the Headteacher for investigations of allegations about members of school staff, volunteers or contractors
- the Chief Executive Officer of the Trust for investigations of allegations about the Headteacher and Trust office team staff members
- the Chief Operating Officer for investigations of allegations about members of the Trust Board and governance committee members
- the Chair of the Trust Board for allegations about the Chief Executive Officer
- Local Governance Committee members must not investigate any allegation
- If appropriate, the case manager may nominate an individual, such as a suitable independent investigator or another member of staff, to investigate/review the allegation on their behalf.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is a reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school/Trust so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school/Trust so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school within the Trust.

If in doubt, the case manager will seek views from the Trust's CEO (and Trust Safeguarding Lead Officer), their HR Advisor, and the local authority designated officer (LADO), as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedures for dealing with allegations
In the event of an allegation that meets the criteria above, the 'case manager' will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the local authority designated officer (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the Police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the Police).
- Inform the Trust Safeguarding Lead Officer.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible **after speaking to the LADO** (and the Police or children's social care services, where necessary). Where the Police and/or children's social care services are involved, the case manager will only share information with the individual that has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with the children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, Police and/or children's social care services, the Trust Lead Safeguarding Officer, and HR Adviser as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If immediate suspension is considered necessary**, the case manager will agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school/Trust and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in the school/Trust and/or liaise with the Police and/or children's social care services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. All staff have access to the Employee Assistance Programme through the Education Support Partnership.
- Inform the parents/carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or Police, if applicable). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents/carers of the child/children involved informed of the progress of the case and seek advice from the LADO regarding what information can be disclosed to the parents/carers (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- **If an allegation is made against a member of the clergy** or a member of a religious order, linked to an educational establishment, the Diocesan Safeguarding Officer must also be notified who will take a lead role for the Diocese in any investigation.

In our primary schools, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the Trust or a school is made aware that the Secretary of State for Education has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the Police are involved, wherever possible, the Trust will ask the Police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Trust's disciplinary process, should this be required at a later point.

Additional considerations for handling allegations or concerns about supply staff and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a supply teacher or contracted member of staff provided by an agency, we will take the actions below in addition to our standard procedures:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The case manager will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school or Trust, while the investigation is carried out
- We will involve the agency fully, but the school/Trust will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution
The case manager will discuss with the local authority's designated officer (LADO) whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or children's social care services.

Conclusion of a case where the allegation is substantiated
If the allegation is substantiated and the individual is dismissed or the school/Trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the Trust will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

The case manager must also discuss this with the Trust Lead Safeguarding Officer.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school/Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will get advice from the LADO, Police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents/carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

Record Keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be false or malicious will be deleted from the individual's personnel file (unless the individual consents for the record to be retained on file).

For all other allegations (which are not found to have been malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and the outcome
- A declaration on whether the information will be referred to in any future reference.

In these cases, a copy will be provided to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- not refer to any allegation that has been found to be false, unsubstantiated, unfounded or malicious, or any repeated allegations which have all been found to be false, unsubstantiated, unfounded or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstance of the case with the LADO to determine whether there are any improvements that we can make to the Trust's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension

- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 12 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

Low-level concerns should be reported to the Headteacher. Any low-level concerns about the Headteachers or members of the Trust office team should be reported to the Trust CEO.

If the concern is raised via a third party, the Headteacher, CEO or Trust Board Chair (if the low level concern relates to the CEO) will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The information collected will be used to categorise the type of behaviour and determine any further action, in line with the Trust's Code of Conduct. The Headteacher, CEO or Trust Board Chair (if the low level concern relates to the CEO) will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded confidentially on file. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Low-level concerns about supply staff and contractors

Low level concerns which are shared about supply staff and contractors will be notified to their employers. The Headteacher will consult with the LADO if unsure whether low-level concerns shared about a member of staff meet the harm threshold.

Appendix 3: Support Organisations and Resources

KSCMP

- Worried about a child: www.kscmp.org.uk/guidance/worried-about-a-child
- Factsheets: www.kscmp.org.uk/training/factsheets
- Supporting resources: www.kscmp.org.uk/training/training-resources
- Video explainers: www.kscmp.org.uk/training/video-explainers
- Missing children: www.kscmp.org.uk/guidance/missing-children

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- NSPCC Whistleblowing helpline: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line
- Shout: www.giveusashout.org

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk

Support for Adults

- KCC Adult Safeguarding: www.kent.gov.uk/social-care-and-health/adult-social-care/adult-safeguarding
- Kent and Medway Safeguarding Adults Board: https://kmsab.org.uk/
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Report Fraud: www.reportfraud.police.uk
- Shout: www.giveusashout.org

Support for Special Education Needs and Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk
- Kent Autistic Trust: www.kentautistictrust.org
- AFASIC: www.afasic.org.uk

- National Autistic Society: www.autism.org.uk
- Kent County Council: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children
- Information Advice and Support Kent (IASK): www.iask.org.uk

Kent Resilience Hub

- https://kentresiliencehub.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): www.nicco.org.uk
- Prisoners' Families Helpline - https://www.prisonersfamilies.org

Substance Misuse

- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- KSCMP: www.kscmp.org.uk/guidance/domestic-abuse
- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Exploitation, violence and modern slavery and trafficking

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: https://kentandmedwayvru.co.uk/
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- The Children's Society: www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation
- Report modern slavery: www.modernslavery.gov.uk
- Unseen: www.unseenuk.org

Honour Based Abuse

- Karma Nirvana: https://karmanirvana.org.uk
- FGM Factsheet
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- The right to choose - government guidance on forced marriage: www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Radicalisation and hate

- Kent and Medway Prevent Team: www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Child-on-child abuse, including harassment and violence

- NSPCC Problematic and harmful sexual behaviour: https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour
- Rape Crisis: https://rapecrisis.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk/advice/creating-safer-places/help-and-advice-for-schools
- Stop it Now! www.stopitnow.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk/

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.ceopeducation.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk
- Gov.UK: https://kidsonlinesafety.campaign.gov.uk/
- Molly Rose Foundation: https://mollyrosefoundation.org

Mental Health

- KSCMP: www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health
- KSCMP: Navigate Wellbeing: Mental Health Signposting for Education Settings
- Kooth: www.kooth.com
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/
- Mind: www.mind.org.uk
- Moodspark:https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/
- MindEd: https://mindedforfamilies.org.uk/
- Kent Therapeutic Alliance and Therapeutic Support Service (KTATSS): https://ktatss.co.uk