



# VALLEY INVICTA ACADEMIES TRUST

## Safeguarding and Child Protection Policy

Valley Invicta Primary School at Aylesford

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### Key document details

Document number:  
SS3

Document type:  
Trust/School

Colleague responsible:  
Trust Safeguarding  
Lead/Headteacher/  
Head of School

Date:  
September 2026

Next review:  
September 2027

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## Safeguarding and Child Protection Policy

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## Safeguarding and Child Protection Policy

### What to do if you have a welfare concern at school

#### 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 and/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 and, if urgent, speak to a DSL first

Follow the school's procedure (refer to DSL or DDSL and record on My Concern):

- Reassure the child and listen carefully; do not promise confidentiality
- Use open questions if needed, for example, TED: Tell, Explain, Describe
- Record facts and not opinions, using the child's own words where possible
- Sign and date your record, report to the DSL. Seek support for yourself as required

#### Inform the Designated Safeguarding Lead and record incident on MyConcern

- 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 portal and/or call the police on 999.
- If no immediate risk of harm, consider what support is needed in lines with Kent Safeguarding 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 portal.
- If the school believes the child may need support, but it 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 Trust/school whistleblowing (Speak Up) procedures.

Follow Kent Safeguarding Partnership escalation procedures.

##### Pupils, students and parents:

Follow school complaints procedure.

#### Record decision making and action taken in the pupil's Child Protection / safeguarding file

#### Monitor

Be clear about: What you are monitoring e.g. behaviour trends, appearance etc.  
How long you will monitor  
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**.

## Safeguarding and Child Protection Policy

### 1. Introduction and Ethos

- Valley Invicta Academies Trust (VIAT) recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is everybody's responsibility and everyone has a role to play. All members of our community (staff, volunteers, trustees, governors, leaders, parents/carers, wider family networks and pupils/students) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- VIAT believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and have their wishes and feelings taken into account and that all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff working with children at VIAT are advised to 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 and if any member of our community has a safeguarding concern about any child or adult they should act immediately.
- This policy applies where there are any child protection concerns regarding children who attend VIAT schools but may also apply to other children who are connected to the schools, for example, siblings or younger members of staff (under the age of 18) or children on student/work placements.
- VIAT recognises the importance of providing an ethos and environment within its schools that will help children to be safe and feel safe. In our schools children are respected and encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what service to provide.
- VIAT 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.
- The Trust's core safeguarding principles are:
  - **Prevention** – positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures;
  - **Protection** – following the agreed procedures, ensure all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns;
  - **Support** – adopt a child-centred approach and provide support for all pupils/students, parents/carers and staff and, where appropriate, implement specific interventions for those who may be at risk;
  - **Collaboration** – with both parents/carers where possible and other agencies – to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (referred to as KCSIE hereafter) which requires individual schools and colleges to have an effective child protection policy.

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All staff, including those who do not work directly with children, will be provided with and required to read Part One of the current version of KCSIE.

- The procedures contained in this policy apply to all staff, including trustees, governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE. All school staff (including temporary staff and volunteers) will have access to a copy of this policy and it will also be available to parents/carers. The policy will be reviewed annually.
- Parents/carers can obtain a copy of this policy and other related policies from the school websites or the school offices.
- The DSLs and Headteachers will ensure regular reporting on safeguarding activity and systems to the Local School Boards, as appropriate.

## 2. Definition of Safeguarding

- “Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education.” (Inspecting safeguarding in early years, education and skills settings, Ofsted, September 2018).
- 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.
- VIAT 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 Safeguarding and Child Protection policy will be reviewed on an annual (minimum) basis by the Local School Boards which have responsibility for oversight and will facilitate a whole school approach to safeguarding and child protection systems. The Designated Safeguarding Leads/Headteachers will ensure regular reporting on safeguarding activity and systems in school to the Local School Boards. The Local School Boards will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.
- VIAT 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.
- In line with KCSIE, safeguarding and promoting the welfare of children is defined for the purpose 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;

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- 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/children;
  - Taking action to enable all children to have the best outcomes.
- VIAT acknowledges that safeguarding includes a wide range of specific 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
    - missing adults and children
    - online safety – 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
    - upskirting

Also, see Appendix 1: Categories of Abuse ('Keeping Children Safe in Education').

### 3. Context

Part Two of this policy outlines the context of the school.

### 4. Related Safeguarding Policies and Guidance

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes, but is not limited to:
  - DfE guidance Keeping Children Safe in Education (KCSIE);
  - Working Together to Safeguard Children (WTSC);
  - Early Years and Foundation Stage Framework (EYFS);
  - Ofsted: 'Education Inspection Framework';
  - Framework for the Assessment of Children in Need and their Families (2000);

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- Kent and Medway Safeguarding Children Procedures (online);
  - Education Act 2002;
  - Education and Inspections Act 2006;
  - Human Rights Act 1998;
  - Equality Act 2010 (including the Public Sector Equality Duty);
  - The Education (Independent School Standards) Regulations 2014;
  - The Non-Maintained Special Schools (England) Regulations 2015;
  - Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), Data (Use and Access) Act 2025 – referred to collectively as ‘Data Protection Laws’
  - Public Sector Equality Duty (PSED).
- 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 pupils under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
  - VIAT will follow local or national guidance in response to any emergencies. The Trust will amend this policy and procedures as necessary but, regardless of the actions required, safeguarding principles will always remain the same and the welfare of the child is paramount.
  - This policy is one of a series in the school’s integrated protection portfolio and should be read in conjunction with the policies which cover (but are not limited to) the subjects and procedures below:
    - Behaviour, including Behaviour Management, linked to the Use of Physical Intervention;
    - Complaints
    - Emergency procedures such as lockdown
    - Searching, screening and confiscation
    - Online Safety, Social Media and Mobile Technology
    - Use of generative AI
    - Anti-Bullying
    - Data Protection and Information Sharing
    - Image use
    - Relationship, Sex and Health Education
    - Personal and Intimate Care
    - Health and Safety
    - Attendance
    - Risk Assessments (e.g. school trips, use of technology)
    - First Aid and Accidents, including medication and managing illness, safer eating and allergies, health and safety, and infection
    - Managing Allegations Against Staff
    - Staff Behaviour Policy / Code of Conduct of Staff (including Acceptable Use of Technology)
    - Safer Recruitment
    - Whistleblowing (Speak Up)
  - 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’;
    - ‘What to do if you are worried a child is being abused’;

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- Early Years Foundation Stage (EYFS) Statutory Framework: The Safeguarding and Welfare Requirements.

### 5. Key Responsibilities

- The Local School Boards (LSB), Executive Headteachers/Headteachers/Heads of School, Leadership Teams and all staff have read and will follow KCSIE. They will also adopt, understand and follow the Safeguarding and Child Protection Policy and procedures.
- The schools have nominated link governors for safeguarding. The nominated link governors will support the DSLs and will take the lead role within the LSBs to ensure that the schools have an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The LSBs, Executive Headteachers/Headteachers/Heads of School and Leadership Teams will ensure that the DSLs are properly supported in their role.

### Governance and Leadership

- The Local School Boards and leadership teams have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Local School Boards have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Local School Boards 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 Local School Boards have a duty to ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- The Trust has two nominated trustees for safeguarding. The schools have nominated governors for safeguarding. These governors will provide appropriate oversight and challenge, including whether safeguarding policies are effective, interlink with other relevant policies, reflect local procedures and are reviewed at least annually and updated when required.
- The Local School Boards will ensure an appropriate senior member of staff, from the schools' leadership teams, 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 Local School Boards and leadership teams will ensure that the DSLs are supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

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- The Local School Boards must be aware of 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/students, 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 see the relevant Trust policies.
- The Local School Boards and leadership teams 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 Safeguarding Lead is responsible for monitoring and reporting back to the Standards and School Improvement Committee and Link Safeguarding Trustees on the level of confidence around safeguarding controls across the nine Trust schools.
- The Executive Headteachers/Headteachers/Heads of School will ensure that the safeguarding policy and procedures adopted by the Local School Boards are understood, and followed by all staff.

### 5.1 Designated Safeguarding Lead (DSL)

- The DSLs have overall responsibility for the day to day oversight of safeguarding child protection systems, (including online safety and understanding the filtering and monitoring systems in place) in the schools. While the activities of the DSLs may be delegated to the DSO, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The schools implement appropriate filtering and monitoring systems in line with DfE standards. The DSLs and leadership teams review these regularly to ensure they are effective and proportionate. Filtering and monitoring are embedded as part of the whole-school safeguarding culture.
- The DSLs will undergo appropriate and specific training to provide them with the knowledge and skills to carry out their role. Deputy DSLs are trained to the same standard as the DSLs. The DSLs and any Deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The Executive Headteachers/Headteachers/Heads of School will be kept informed of any significant issues by the other DSLs.
- **It is the role of the DSLs to carry out their functions as identified in Annex B of KCSIE. This includes but is not limited to:**
  - Act as the central contact point and a source of support, advice and expertise for all staff to discuss safeguarding and child protection concerns.
  - Maintain a confidential recording system for safeguarding and child protection concerns, ensuring that child protection files are kept up to date, stored securely and transferred appropriately when a child moves setting.

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- Coordinate safeguarding action for individual children, including children who need a social worker, children receiving early help, children who are looked after or previously looked after, and children subject to child protection or child in need plans.
- Manage referrals to the Front Door Service, the police, the Channel programme, the Disclosure and Barring Service (DBS) and other agencies as required.
- Work with others, including the Headteacher, senior leaders, relevant staff, social workers, early help services, Family Help workers, local authority services and other safeguarding partners.
- Liaise with other agencies and professionals in line with KCSIE and WTSC 2018.
- For children with a social worker or who are looked after, ensure the DSLs have the details of the child's social worker and the name of the Virtual School Head (VSH) in the authority that looks after the child, liaising closely with the designated teacher.
- Recognise that children with a social worker or those in kinship care may require additional support and work in partnership with the Virtual School Head (VSH) to promote positive outcomes for these pupils.
- Ensure the school contributes to multi-agency safeguarding arrangements and is appropriately represented at relevant safeguarding meetings, including Child Protection Conferences.
- Manage and monitor the school's role in any multi-agency plan for a child.
- Ensure that locally established safeguarding procedures, including those of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP), are followed as necessary.
- Promote educational outcomes by sharing relevant information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and school leadership staff where appropriate.
- Take lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
- Ensure all staff have access to appropriate safeguarding and child protection training, including online safety, and receive regular safeguarding updates in line with the recommendations within KCSIE.
- Keep the Headteacher informed of safeguarding issues, particularly significant safeguarding concerns and ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- Be aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning.
- Be available during term time and school hours for staff to discuss safeguarding concerns.
- Ensure that, where a DSL is unavailable, appropriate arrangements are in place so that safeguarding concerns can be raised, received, monitored and acted upon without delay. Staff should be clear that urgent concerns must be reported immediately to the DSL, a Deputy DSL, a senior leader, or directly to the appropriate service where urgent safeguarding action may be required.
- Ensure adequate and appropriate DSL cover arrangements are in place during school closures, out-of-hours activities and out-of-term activities arranged by the school.
- Ensure that appropriate and specific training is undertaken by DSLs to provide them with the knowledge and skills required to carry out their role. This training will be updated at least every two years, with knowledge and skills refreshed at regular intervals and at least annually to keep up with developments relevant to safeguarding and child protection.

### Members of Staff

## Safeguarding and Child Protection Policy

- School staff play a particularly important role in safeguarding as they are in a position to observe any changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- **All members of staff have a responsibility to:**
  - Consider, at all times, what is in the best interests of the pupil/student and act accordingly.
  - Maintain an attitude of "it could happen here" when considering safeguarding concerns, and demonstrate professional curiosity where there may be indicators that a child is at risk.
  - Provide a safe, secure and supportive environment in which children can learn and thrive.
  - Be aware that children may not feel ready, able or know how to tell someone that they are being abused, exploited or neglected, and may not recognise their experiences as abusive or harmful. This will not prevent staff from exercising professional curiosity and speaking to the DSL/DSO where they have concerns.
  - Be aware of the indicators of abuse, neglect and exploitation so that they can identify children who may need help or protection.
  - Be able to identify and act upon indicators that a child may be experiencing, or be at risk of developing, mental health difficulties, recognising that mental health difficulties may, in some circumstances, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
  - Be prepared to identify children who may benefit from early help, understand the early help process and their role within it, and support children in accessing appropriate services before statutory intervention where appropriate.
  - Understand the local processes for seeking advice and making referrals to children's social care, including Requests for Support to the Front Door Service and statutory assessments under the Children Act 1989, in line with the Kent Support Levels Guidance and local procedures. This includes circumstances where a child may be in need, disabled, or suffering, or likely to suffer, significant harm.
  - Be aware of the safeguarding systems and procedures within school, including relevant policies, procedures, information and training provided as part of induction, the safeguarding response to children who are absent from education, and the role and responsibilities of the DSL/DSO.
  - Undertake safeguarding and child protection training as part of induction, including online safety training. This will include an understanding of the expectations and responsibilities relating to filtering and monitoring, and will be regularly updated through ongoing safeguarding training and updates.
  - Know what to do if a child tells them that they are being abused, neglected or exploited, including understanding the potential impact that abuse, neglect and exploitation can have on a child.
  - Reassure children who report concerns that they are being taken seriously, supported and kept safe, while following the appropriate safeguarding procedures.
  - Speak to the DSL/DSO if they are unsure how to respond to or manage any safeguarding matter or concern.
  - Know how to maintain an appropriate level of confidentiality and understand that information should be shared appropriately, lawfully and proportionately where this is necessary to safeguard a child.
  - Share safeguarding concerns in a timely manner, in accordance with the UK GDPR and the Data Protection Act 2018. Staff should understand that the lawful basis for sharing safeguarding information does not require consent where the relevant legal conditions for sharing are met.

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- Build and maintain trusted, professional relationships with children and parents/carers that support appropriate communication and the early identification of needs and concerns, in line with relevant school policies.
- Act in accordance with all relevant safeguarding policies and procedures.
- Where applicable, follow the Teachers' Standards, including the requirement for teachers to safeguard pupils'/students' wellbeing and maintain public trust in the teaching profession.
- Where applicable, report known cases of female genital mutilation (FGM) to the police as soon as possible, in accordance with the relevant statutory reporting duty and safeguarding procedures.

### Children and Young People

- **Children and young people (learners) 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.

### 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 schools and to:
  - Understand and adhere to the relevant school policies and procedures.
  - Talk to their children about safeguarding including online safety and support the schools in their safeguarding approaches.
  - Identify behaviours or changes which could indicate that their child or another child may be at risk of harm including online.
  - Speak to the schools 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.

Parents/carers can obtain a copy of the Safeguarding and Child Protection Policy and other related policies on request and can view them via the school websites.

## 6. Recognition and Types of Abuse, Neglect and Exploitation

- Trust schools recognise that safeguarding and promoting the welfare of children is everyone's responsibility. All staff have a responsibility to provide a safe environment in which children can learn and understand that effective safeguarding requires timely information sharing, professional curiosity and appropriate multi-agency working.
- Staff will maintain an attitude of "it could happen here" where safeguarding is concerned. When there are concerns about a child's welfare, staff will always act in the best interests of the child.

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- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified within Working Together to Safeguard Children, Keeping Children Safe in Education (KCSIE) and the Kent Support Levels Guidance. Staff receive regular safeguarding training and updates to ensure they remain alert to emerging risks and local safeguarding issues.
- All staff are expected to follow the guidance "What to do if you are worried a child is being abused" and report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.
- Trust schools recognise four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- Staff recognise that abuse, neglect and exploitation may present in many different ways. Indicators will vary depending upon a child's age, developmental stage, communication needs, lived experience and individual circumstances. Children may display one, several or no obvious indicators of harm.
- Staff understand that indicators of abuse, neglect or exploitation do not automatically mean that a child is being harmed. However, all concerns, no matter how small they appear, will be taken seriously, recorded appropriately and considered by the DSL on a case-by-case basis using professional judgement.
- Trust schools recognise that abuse, neglect, exploitation and safeguarding concerns are rarely isolated incidents and cannot always be defined by a single category. Multiple safeguarding concerns frequently overlap and staff will always consider the cumulative impact of a child's experiences.
- Staff will demonstrate professional curiosity, remaining vigilant when something does not feel right, even where there is no clear disclosure or single indicator of abuse. Staff will seek advice from the DSL whenever they have concerns.
- Staff recognise that children may be harmed by adults or by other children and that safeguarding incidents can occur both inside and outside school, including within families, peer groups, the wider community and online environments.
- Staff will always consider whether children may be at risk of abuse, neglect, exploitation or harm in situations outside their families. Trust schools recognise that extra-familial harm can include, but is not limited to:
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Financial exploitation
  - County Lines
  - Serious youth violence
  - Sexual abuse
  - Sexual harassment
  - Harmful sexual behaviour
  - Domestic abuse within young people's own intimate relationships
  - Radicalisation and extremism
  - Online abuse and exploitation

## Safeguarding and Child Protection Policy

- When assessing safeguarding concerns, the DSL will consider the child's wider lived experience and the interaction between family, peer, community and online risks to ensure safeguarding responses are child-centred and contextually informed.
- Trust schools recognise that any child may require additional support before statutory intervention becomes necessary. Children and families may benefit from universal services, Early Help, Family Help or targeted support at the earliest opportunity to prevent concerns from escalating.
- Staff will be particularly alert to children who may be more vulnerable or who may require additional safeguarding support, including children who:
  - are disabled or have specific health conditions
  - have Special Educational Needs and Disabilities (SEND), with or without an Education, Health and Care Plan
  - have mental health needs
  - are young carers
  - are pregnant or young parents
  - display abusive, violent or harmful behaviours
  - are vulnerable to anti-social behaviour, gangs, organised crime or County Lines
  - frequently go missing from education, home or care
  - are electively home educated
  - have experienced repeated suspensions, alternative provision, part-time timetables or are at risk of permanent exclusion
  - are at risk of exploitation, modern slavery or trafficking
  - are vulnerable to radicalisation
  - have a parent or carer in custody or are affected by parental offending
  - live in families experiencing domestic abuse, substance misuse or adult mental ill health
  - misuse drugs or alcohol themselves
  - are at risk of honour-based abuse, including Female Genital Mutilation (FGM) or Forced Marriage
  - are privately fostered
  - have experienced bereavement, adversity or other traumatic events affecting their wellbeing.
- Where staff identify that a child may benefit from additional support, they will share their concerns promptly with the DSL so that appropriate support can be considered.
- Staff will remain alert to:
  - disclosures or concerns raised by children about themselves, their peers or family members
  - changes in behaviour, presentation, appearance, attendance, emotional wellbeing or engagement
  - indicators of abuse, neglect or exploitation
  - concerning interactions between children and parents or carers
  - parental behaviours that may increase risk, including substance misuse, domestic abuse, coercive or controlling behaviour, criminality, adult mental ill health or parents/carers appearing under the influence of drugs or alcohol
  - risks arising from peer relationships, the wider community or online activity
  - children with additional vulnerabilities or complex needs who may require specialist support.
- Trust schools recognise the importance of listening to children and understanding their wishes, feelings and lived experiences. Wherever appropriate, the child's voice will inform safeguarding

## Safeguarding and Child Protection Policy

decisions while recognising that immediate action may still be required to protect them from harm.

- Children may not recognise that they are experiencing abuse, neglect or exploitation and may not feel ready, or know how, to tell someone. This will never prevent staff from acting on concerns or discussing them with the DSLs.
- All reports, disclosures and safeguarding concerns raised by children will be taken seriously. Staff will reassure children that they are being listened to, supported and kept safe, and that they will never be made to feel ashamed or responsible for raising concerns.
- Trust schools recognise that technology is a significant safeguarding factor and that online safety is embedded throughout safeguarding practice. Children may experience abuse or exploitation online from adults or peers they know, as well as from strangers. Abuse frequently occurs both online and offline simultaneously, and online activity may facilitate or increase the risk of harm in a child's daily life.
- Following any safeguarding concern, searches, screening or confiscation of items, including electronic devices, will be undertaken in accordance with the schools' Behaviour policies and the Department for Education guidance Searching, Screening and Confiscation. The DSLs will be informed whenever a search identifies a safeguarding concern or where there were reasonable grounds to suspect a prohibited item. The DSLs will consider any wider safeguarding implications and ensure appropriate action is taken.
- All safeguarding concerns will be responded to promptly, proportionately and in accordance with statutory guidance. The schools are committed to working in partnership with children, families and relevant agencies to safeguard children, promote their welfare and ensure they receive the right help at the right time.

## 7. Safeguarding and Child Protection Procedures

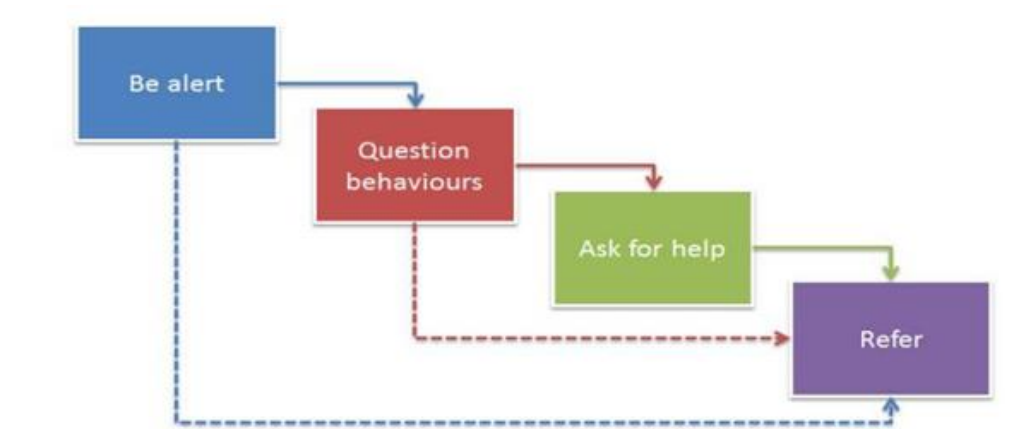
All members of staff are expected to be aware of and follow this approach if they are concerned about a child:

['What to do if you are worried a child is being abused'](#) 2015.

- In all cases, if staff are unsure, they will always speak to the DSLs or Deputy DSLs.
- Trust schools recognise that some children have additional or complex needs and may require access to intensive or specialist services to support them.

### 7.1 Responding to Child Protection Concerns

## Safeguarding and Child Protection Policy



- 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 the school 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.
- Trust schools recognise 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.
- Trust schools 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](http://www.kscmp.org.uk)

## Safeguarding and Child Protection Policy

- 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 DSLs in line with this policy. The DSLs 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 school 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.
  - Kent Family Hubs accessing universal services and community-based Early Help for children with emerging needs, including support available through Kent Family Hubs, the schools 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 or colleges, 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 the 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

## Safeguarding and Child Protection Policy

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.
  - 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.
- Trust schools 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 Children's Front Door and/or the police where appropriate, so that concerns can be considered through the appropriate multi-agency process.
- Trust schools recognise 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 Trust schools 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 schools believe a child may need support but is unclear whether a Request for Support should be submitted, the DSLs 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 DSLs 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 school 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 on page the safeguarding flowchart
  - Any safeguarding action taken by staff must be shared with the DSL as soon as possible.

## Safeguarding and Child Protection Policy

- 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 DSLs 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 schools to children and families will be recorded and reviewed. The DSLs will oversee support where families are requiring additional support, to ensure that the school activity does not obscure potential safeguarding concerns from the wider professional network.

### 7.2 Multi-agency working

- Trust schools recognise 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 schools' leadership teams, Local School Boards and DSLs 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.
- Trust schools 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 Trust schools 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.
- Trust schools 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 Trust schools will provide relevant information about the child's presentation, attendance, progress, relationships,

## Safeguarding and Child Protection Policy

family circumstances, wider context and any known risks outside the home, including online, peer group or community-based concerns.

The Executive Headteacher/Headteacher/Heads of School and DSLs are aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning. Trust schools will respond in line with relevant policies, guidance and procedures.

### 8. Record-Keeping

#### Recording, storing and managing safeguarding and child protection records

- All safeguarding concerns, discussions, decisions and the reasons or justifications for those decisions will be recorded in writing using the school safeguarding system MyConcern. Records will be passed to the DSLs without delay.
- Staff will record any welfare or safeguarding concern that they have about a child on the MyConcern safeguarding recording system, using a body map where visible injuries to a child have been observed. MyConcern records are kept securely on the central database, which can only be accessed by the DSLs and members of the Safeguarding Team.
- If there is an immediate safeguarding concern, staff will speak to or consult with the DSLs first. Completing a written record or referral must not delay urgent safeguarding action, as reporting and responding to immediate concerns takes priority.
- Records will be completed as soon as possible after the incident or event and will be signed and dated by the member of staff. Records will be accurate, factual and written in a clear and professional manner, using the child's own words where relevant. Child protection records will record facts and 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, the child's own words where relevant, 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 DSLs.
- Our child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, actions taken or not taken, decisions reached, the rationale or justification for those decisions and any outcomes.
- Child protection records will be maintained for individual children and kept separately from the child's main school record and from other records relating to the child. Records will be kept confidentially, retained centrally and securely by the DSLs, and managed in accordance with data protection legislation and Trust record retention arrangements.
- Safeguarding records will be shared with staff on a 'need to know' basis only. The DSLs will have oversight of child protection records and will ensure they are reviewed, shared and transferred

## Safeguarding and Child Protection Policy

appropriately in line with statutory guidance, KSCMP procedures and the schools' record keeping arrangements.

- The Executive Headteachers/Headteachers/Heads of School will be kept informed by the DSLs of any significant safeguarding issues.
- Safeguarding records relating to individual children will be retained for a reasonable period after they have left their school, in accordance with Trust record retention arrangements and applicable statutory requirements.

### Transferring and receiving child protection files and safeguarding information

- When a child leaves a 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.
- All child protection records/files will be transferred securely, separately from the child's main file, under confidential and separate cover, and in accordance with data protection legislation and statutory safeguarding guidance. The transfer will be made to the DSL at the receiving setting and confirmation or a receipt of delivery 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, safeguard the child, promote their welfare, continue appropriate support or make appropriate arrangements for the child. 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 a VIAT 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 SENCO/named person with oversight for SEN, 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, Trust schools 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 a VIAT 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.

## 9. Confidentiality and Information Sharing

- VIAT 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.

## Safeguarding and Child Protection Policy

- Where reasonably possible, Trust schools will hold more than one emergency contact number for each pupil/student. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.
- VIAT has an appropriately trained Data Protection Officer as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements.

The Trust Data Protection Officer is:

### Judicium Education

- All staff will be made aware of the need to protect children's privacy and to handle personal information fairly, lawfully, proportionately and securely, in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), relevant data protection principles and the Trust's data protection and information governance policies.
- Data protection legislation does 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, relevant data protection requirements and the need to promote the welfare and safety of the child and others.
- All staff will receive appropriate training, information and guidance on confidentiality, information sharing and data protection, including when information should be shared and when it should be withheld. This will be provided through induction, safeguarding training and relevant Trust policies and procedures. Staff should also refer to the Trust's relevant data protection, confidentiality and information-sharing policies.
- Staff have a professional responsibility to be proactive in sharing information as early as possible where this may help identify, assess or respond to concerns about a child's safety, welfare or wellbeing. Staff must not assume that a colleague or another professional will share information that may be critical to keeping a child safe.
- Staff must not promise a child confidentiality or secrecy where information may need to be shared to protect their safety or wellbeing. Staff must understand that confidentiality must never prevent appropriate safeguarding action from being taken. Safeguarding concerns may need to be shared with the DSL, the Front Door Service, social care, the police and/or other relevant agencies, where appropriate.
- 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 consent or agreement where this is necessary to safeguard a child, promote their welfare, prevent delay or avoid increasing risk. Where necessary and appropriate, parents/carers may be contacted to authorise the sharing of information.
- Trust schools will take appropriate steps to verify requests for information. Where someone contacts a VIAT school requesting information, checks will be made to establish their identity and the service or organisation they represent before information is shared.

## Safeguarding and Child Protection Policy

- Decisions about whether to share or withhold information will be considered carefully and, where appropriate, recorded, including the reasons for the decision and details of any safeguarding referrals made. Staff may seek advice where necessary, including from the DSLs, the relevant safeguarding team, social care, the Local Authority Designated Officer (LADO), the police or other appropriate agencies.
- The Executive Headteachers/Headteacher/Heads of School and DSLs will share relevant safeguarding information with staff on a need-to-know basis, so that staff can safeguard and support children appropriately. All matters relating to child protection will be treated as confidential, and information will only be disclosed where there is a legitimate safeguarding or professional need.
- Information sharing in relation to children who may be at risk of radicalisation will have regard to relevant Prevent guidance. Where appropriate, consideration will be given to whether consent can be relied upon for information sharing. In the case of younger children or those with certain needs, consent may be provided by their parents/carers. Where consent is not obtained, or it is not appropriate or possible to rely on consent, information may still be shared where there is a lawful basis for doing so and data protection legislation continues to be complied with.

### 10. Complaints

- All members of VIAT school communities should feel able to raise or report any concerns about children's safety, safeguarding practice, or potential failures in the school safeguarding arrangements.
- The schools have a complaints procedure available to parents/carers, children/young people, staff and visitors who wish to raise a concern or complaint. Concerns and complaints can be raised in accordance with the Trust Complaints Policy.
- The leadership teams at Trust schools will take all safeguarding concerns, complaints and whistleblowing reports seriously. Concerns and complaints will be considered and responded to in line with the relevant policies and procedures.
- While we encourage members of our community to raise concerns and complaints directly with the schools where appropriate, we recognise that this may not always be possible. Alternative routes for raising concerns are available where individuals do not feel able to raise concerns internally or feel that their concerns have not been appropriately addressed.
- Children, young people and adults who have experienced, witnessed or are concerned about abuse, sexual abuse or harassment in an education setting can contact the NSPCC Report Abuse in Schools helpline on 0800 136 663 or by email at [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Staff who do not feel able to raise concerns about child protection or safeguarding failures internally, or who feel that their concerns are not being addressed, can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285. The service is available 8am to 8pm, Monday to Friday. Staff can also contact [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Safeguarding and Child Protection Policy

- Any concern, complaint or report that constitutes an allegation against, or concern about, a member of staff, supply teacher, volunteer or contractor will be dealt with in accordance with the relevant safeguarding procedures.

### 11. Specific Safeguarding Issues

- VIAT is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm.
- In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex A of KCSIE which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in the flow chart on page 4 of this policy, and speak with the DSLs or deputies.

### 12. Child on Child Abuse

- All members of staff at VIAT recognise that children are capable of abusing other children. Child-on-child abuse may take place online, face-to-face, physically, verbally or through a combination of channels, and can happen both inside and outside school.
- VIAT recognises 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 peers – 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, including sexual comments, remarks, jokes and online sexual harassment, whether as a standalone incident or as 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 nude and semi-nude images and/or videos, including self-generated intimate images and/or videos and those generated or manipulated using Artificial Intelligence (AI), including deepfakes. This may previously have been referred to as sexting or youth produced sexual imagery.
  - Upskirting, which is a criminal offence and 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 causing the victim humiliation, distress or alarm.
  - Initiation/hazing type violence and rituals, which can 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.
- VIAT recognises that harmful sexual behaviour exists on a continuum, from developmentally inappropriate or problematic sexual behaviour through to abusive behaviour and sexual violence.

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- VIAT believes that abuse is abuse and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. Such attitudes can contribute to a culture of unacceptable behaviour, misogyny or misandry, normalise abuse and create an unsafe environment for children, potentially preventing children from coming forward to report concerns.
- VIAT recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and may not be being reported. Staff will maintain an attitude of ‘it could happen here’.
- All staff have a role to play in challenging inappropriate, harmful or abusive behaviours between children. Staff recognise that child-on-child abuse may be affected by the age, developmental stage, sex, ability, SEND, culture, ethnicity, sexual orientation, gender identity, power imbalance, peer group dynamics and wider contextual factors affecting those involved.
- Staff will be aware that children may minimise, normalise or fail to recognise harmful behaviours and that some behaviours may be facilitated, threatened, encouraged or shared online.
- VIAT recognises that, for some but not all forms of child-on-child abuse, girls are more likely to be victims and boys more likely to be perpetrators. However, all child-on-child abuse is unacceptable, will be taken seriously and will be responded to appropriately.
- Concerns will be considered in context, taking account of the age and stage of development of the children involved, any SEND or communication needs, trauma or abuse history, power imbalance, coercion, intimidation, threats, exploitation, intent, frequency, escalation, the nature of the behaviour, the impact on those affected and any wider safeguarding risks.
- Concerns about learners’ behaviour, including child-on-child abuse taking place off-site or online, will be responded to as part of a partnership approach with learners and parents/carers. Off-site behaviour concerns will be recorded and responded to in line with existing appropriate policies, including anti-bullying, acceptable use, behaviour, and the safeguarding and child protection policy.
- Section 89(5) of the Education and Inspections Act 2006 gives Headteachers a statutory power to discipline pupils for poor behaviour outside the school premises, for example when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.

### Prevention

- Child-on-child abuse is preventable. VIAT 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.
- In order to minimise the risk of child-on-child abuse, VIAT will:
  - Ensure a robust Anti-Bullying Policy is implemented at all times.
  - Ensure staff training is regularly kept up to date.
  - Ensure all students are provided with an age/ability appropriate PSHE curriculum, as well as an appropriate RSE curriculum.

## Safeguarding and Child Protection Policy

- Ensure reporting systems are well promoted, easily understood and easily accessible to children.
- Provide appropriate mechanisms for children to report concerns.

### Reporting and responding to concerns

- VIAT wants children to feel able to confidently report abuse and know their concerns will be treated seriously. Reporting systems will be well promoted, easily understood and accessible.
- All allegations and concerns relating to child-on-child abuse, whether on-site, off-site or online, will be reported to the DSL and recorded in line with school procedures.
- The DSL will consider the concern in line with relevant school policies and procedures, including anti-bullying, behaviour and safeguarding and child protection procedures.
- Concerns will be responded to, and where appropriate investigated, under relevant school procedures while recognising the need to engage with multi-agency processes where safeguarding or child protection concerns are identified.
- Responses will be child-centred, proportionate and based on the circumstances of the individual case.
- Where concerns involve harmful sexual behaviour, sexual harassment or sexual violence, the DSL will respond in line with Part Five of KCSIE and relevant local and national guidance.
- Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- 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 reporting a concern.

### Risk and needs assessment

- When a concern of child-on-child abuse is reported, the 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 experienced harm.
  - 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 experienced harm, 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.

## Safeguarding and Child Protection Policy

- The risk and needs assessment 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.

### Supporting children

- VIAT recognises that child-on-child abuse is a safeguarding issue for all children involved. Trust schools 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.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported according to their individual needs.
- Support may include:
  - Pastoral staff who will listen carefully and take all reports seriously, avoiding victim blaming.
  - Pastoral staff liaising with parents/carers appropriately.
  - Trusted adult support and safety planning where appropriate.
  - Reasonable adjustments where required.
  - Curriculum responses and behaviour support.
  - Signposting to local or national services.
  - Referrals to external agencies where appropriate.
  - Provision of in-house counselling services and external agencies where appropriate.
  - Appropriate arrangements to reduce contact or manage risk where necessary.
- All staff will ensure that school policies relating to anti-bullying, behaviour, safeguarding and child protection procedures are followed when they become aware of concerns.

### 13. Child on Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, VIAT will follow the guidance outlined in Part Five of KCSIE and relevant DfE guidance on sexual violence and sexual harassment between children in schools and colleges.
- VIAT recognises that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face-to-face, both physically and verbally.
- Sexual violence and sexual harassment are never acceptable.
- VIAT will maintain an attitude of 'it could happen here'.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- Abuse that occurs online or outside Trust schools will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies and procedures.

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- VIAT recognises that the law is in place to protect children rather than unnecessarily criminalise them. Where relevant, this will be explained to pupils/students 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.
- VIAT recognises that an initial disclosure to a trusted adult may only be the first incident reported rather than representative of a singular incident. Trauma can impact memory and children may not be able to recall all details or the timeline of abuse.
- All staff will be aware that certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

### Responding to sexual violence and sexual harassment

- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment, where appropriate, on a case-by-case basis. This will explore how best to support and protect the victim, the alleged perpetrator and any other children involved or impacted.
- The assessment will consider:
  - The wishes and feelings of the victim.
  - The nature of the alleged incident.
  - Whether a crime may have been committed.
  - The ages and developmental stages of the children involved.
  - Any power imbalance, coercion, intimidation or exploitation.
  - Whether the alleged incident is a one-off or part of a sustained pattern of abuse.
  - Any ongoing risks to the victim, other children, staff or the wider school community.
  - Any vulnerabilities, SEND or additional needs.
  - Any online element.
  - Any wider contextual safeguarding factors.
  - Any links to other safeguarding concerns.
- The risk and needs assessment will be recorded and kept under review. It will consider the victim, especially their protection and support, the alleged perpetrator, all other children and staff, and any actions required to protect them.
- Any concerns involving an online element will be managed in accordance with relevant local and national guidance and advice.
- Reports will initially be managed internally by the school and, where necessary, will be referred to Integrated Children's Services and/or the police.
- The decision-making and required action taken will vary on a case-by-case basis and will be informed by the wishes of the victim, the nature of the alleged incident, including whether a crime may have been committed, the ages and developmental stages of the children involved, any power imbalance, whether the alleged incident is a one-off or a sustained pattern of abuse, whether there are ongoing risks to the victim, other children or staff, and any other related issues or wider context.

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- If at any stage the DSL is unsure how to proceed, advice will be sought from the Front Door Service.

### Multi-agency support and parents/carers

- Trust schools will take appropriate safeguarding, pastoral and/or behaviour-related action in response to child-on-child abuse.
- Where the concern indicates that a child may require Family Help, statutory support or protection, the 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.
- Trust schools 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.
- Trust schools will not share confidential information about other children, including safeguarding action, support or sanctions, unless there is a lawful and appropriate basis to do so.

## 14. Nude and/or Semi-Nude Image Sharing by Children

- Trust schools recognise that the making or sharing of nudes and/or semi-nudes by children and young people under the age of 18 is a safeguarding issue. This includes both consensual and non-consensual incidents. All concerns will receive a safeguarding response, with the response being proportionate to the circumstances and focused on the best interests, safety and wellbeing of the children involved.
- The **term 'nudes and/or semi-nudes'** refers to nude or semi-nude images, videos or livestreams of children under the age of 18. This includes imagery that is:
  - created or taken by a child;
  - created or taken by a child and subsequently shared by another person;
  - shared consensually or non-consensually;
  - digitally altered or manipulated; or
  - generated or created using artificial intelligence (AI), including deepfakes or similar synthetic imagery.
- Nudes and/or semi-nudes may be shared through social media, messaging applications, gaming platforms, forums, livestreams, between devices or through any other digital route.
- Creating, possessing or sharing nude or semi-nude imagery of a child under 18 may constitute a criminal offence, including where the imagery was created or shared consensually. Trust schools recognise that the law is intended to protect children and that responses should avoid unnecessary criminalisation. Safeguarding responses will therefore be child-centred, proportionate and focused on protecting and supporting children.
- All staff should be familiar with the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. This applies to staff working with children of all ages, not only older pupils or students.

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### Staff response

- When a member of staff becomes aware of a concern involving the making or sharing of nudes and/or semi-nudes, they must:
  - report the concern to the DSL or deputy DSL without delay;
  - never intentionally view, copy, print, download, share, forward, store or save the imagery;
  - never ask a child to send, show, download or share the imagery with them;
  - report immediately to the DSL if they have inadvertently viewed the imagery;
  - not delete the imagery or ask a child to delete it;
  - not investigate the incident themselves;
  - not ask children involved to provide unnecessary details about the imagery or attempt to establish the facts beyond what is necessary to make an immediate safeguarding report;
  - avoid saying or doing anything that could blame, shame or stigmatise a child;
  - reassure the child that they will be supported and that their safety is the priority;
  - explain that the concern must be shared with the DSL and that confidentiality cannot be promised; and
  - only share information about the incident with those who need to know in order to safeguard the child and manage the concern.

### DSL response

- The DSL, or deputy DSL acting on their behalf, will respond in accordance with the UKCIS guidance, this safeguarding and child protection policy and relevant local safeguarding procedures.
- The DSL will undertake an initial review of the incident to understand the context and assess the risks and needs of the children involved. This will include consideration of factors such as:
  - the age and developmental stage of the children involved;
  - whether the image was created or shared consensually or non-consensually;
  - whether there is any imbalance of power or vulnerability;
  - coercion, pressure, threats, blackmail or grooming;
  - whether the imagery has been redistributed or is at risk of further distribution;
  - whether an adult is involved;
  - whether there are concerns about exploitation or abuse;
  - whether the imagery involves sexual acts, violence or other high-risk features;
  - whether the imagery has been digitally altered or generated using AI;
  - whether there are concerns about harmful sexual behaviour, child sexual exploitation, child criminal exploitation or abuse within an intimate personal relationship; and
  - the immediate safety, welfare and support needs of each child involved.
- The DSL may speak with relevant staff and children as appropriate, seek advice from the relevant safeguarding partners, involve parents/carers where safe and appropriate, make a referral to children's social care and/or contact the police where required.
- Parents/carers will normally be informed and involved at an early stage where this is safe and appropriate. They should not be informed where there is good reason to believe that doing so would place a child at further risk of harm or otherwise compromise safeguarding action.

### Referral to children's social care and/or the police

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- A referral to the relevant children's social care service and/or the police will be made immediately where the circumstances require this, including where:
  - an adult is involved;
  - there is reason to believe a child has been coerced, blackmailed, groomed or exploited;
  - there are concerns about a child's capacity or ability to consent, including because of age, developmental stage, vulnerability or additional needs;
  - the imagery involves sexual acts, violence, threats, exploitation or other high-risk circumstances;
  - the imagery involves a child under 13 or depicts sexual activity that is unusual for the child's developmental stage;
  - a child is at immediate risk of harm;
  - there are wider safeguarding concerns, including child sexual exploitation, child criminal exploitation, harmful sexual behaviour or abuse within an intimate personal relationship between children; or
  - any other circumstances indicate that statutory intervention or police involvement is necessary.
- The DSL will seek advice from the relevant local authority safeguarding service where there is uncertainty about whether a referral is required.
- The DSL may involve other agencies at any stage if additional information or safeguarding concerns emerge.

### Recording and follow-up

- All decisions, actions, referrals, advice received and outcomes will be accurately recorded in accordance with the school's child protection and safeguarding recording procedures. Records should include the rationale for significant decisions.
- Trust schools will continue to monitor and support the children involved and will review safeguarding risks where further information, incidents or concerns emerge.
- The schools' approach will remain child-centred and proportionate. Children who are involved in making or sharing nudes and/or semi-nudes will be supported rather than blamed or shamed, while appropriate action will be taken to protect any child who may be at risk of harm.

## 15. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- VIAT recognises that child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, serious violence, trafficking and modern slavery are safeguarding concerns which may overlap with one another and with other forms of abuse, neglect and harm. Trust schools will consider the full context of a child's lived experience, including risks within and outside the home, peer and friendship groups, community locations, transport routes and online environments.
- CSE and CCE are forms of child 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 sexual or criminal activity. This may be in exchange for something the child needs or wants, and/or for the financial or other advantage, increased status or benefit of the perpetrator or facilitator, and/or through violence or the threat of violence.

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- Exploitation may be carried out or facilitated by individuals, organised networks or gangs. A child may believe that they are willingly participating in, or are a member of, the group exploiting them. Children of any age or sex can be exploited, including children who have been moved or trafficked for the purpose of exploitation. A child cannot consent to being exploited, abused or trafficked.
- Children may not recognise that exploitation is taking place and may be groomed, coerced, controlled, threatened or manipulated into situations or activities they do not fully understand. Children who are exploited may also be coerced into behaviour that appears to be offending. Trust schools will therefore consider whether apparent offending behaviour may be linked to exploitation, abuse or coercion before determining an appropriate response.
- **Child sexual exploitation (CSE)** is a form of child sexual abuse. It may occur as a one-off incident or through a series of incidents over time and may range from opportunistic abuse to complex and organised exploitation. CSE can affect any child, including 16- and 17-year-olds who can legally consent to sexual activity. Some children may believe they are in a genuine or consensual relationship and may not recognise that they are being exploited.
- **Child criminal exploitation (CCE)** occurs when children are manipulated, coerced or controlled into criminal activity for the benefit of others. This may include transporting, storing or selling drugs or money; working in cannabis factories; shoplifting; pickpocketing; vehicle crime; carrying or using weapons; threatening or committing serious violence; or other criminal activity. Children may become trapped through grooming, coercion, intimidation, violence, threats, debt bondage or threats towards themselves or their families. Both boys and girls can experience CCE and may also be at increased risk of CSE.
- **County lines** is a form of criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other forms of communication to facilitate the supply and distribution of illegal drugs. County lines activity can take place locally as well as across the UK and does not require a particular distance of travel. 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 or personal circumstances.

### 16. Serious Violence

- Serious violence may involve weapons, gangs, criminal networks or serious physical harm. It may include concerns about a child carrying, threatening with or using a knife or other weapon, or being exposed to weapons through peers, gangs, criminal networks or community-based harm. Risk may be increased by factors including previous experience of child maltreatment, involvement in offending, drug or alcohol use in early adolescence, previous victimisation or displays of violence, suspension, permanent exclusion or time spent in alternative provision. Serious violence may occur or increase at particular times and places, including before or after school and while children are travelling to and from school.
- Staff will remain alert to indicators that a child may be at risk of, or experiencing, exploitation, trafficking, modern slavery or serious violence. Indicators may include:
  - unexplained gifts, money, phones or other possessions;
  - increased absence from school or regularly missing education;
  - going missing from home or care, or regularly returning home late;

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- changes in friendship groups or relationships, particularly with older individuals or groups;
  - a significant decline in educational attainment, performance or engagement;
  - unexplained changes in behaviour, presentation or wellbeing;
  - signs of self-harm;
  - signs of assault or unexplained injuries;
  - drug or alcohol misuse;
  - association with individuals involved in exploitation, gangs or criminal networks;
  - receiving or making requests relating to drugs, including through mobile phones or other communication channels;
  - transporting, storing or collecting drugs, money or other items;
  - being found in accommodation or locations with which they have no apparent connection, including a hotel room or an address associated with drug activity;
  - owing money or being subject to a debt or perceived debt to exploiters;
  - having a bank account or other financial facility used to facilitate criminal activity;
  - possession of weapons or concerns about access to weapons; and
  - vulnerability to grooming, coercion, threats, intimidation or online exploitation.
- Trust schools will seek to understand when and where children may feel unsafe. This will include listening to children, taking account of their views and experiences, consulting staff and working with parents/carers and relevant partner agencies where appropriate. Trust schools will consider contextual safeguarding factors, including risks in peer groups, neighbourhoods, public spaces, transport routes and online environments.
  - Where a member of staff is concerned that a child may be at risk of, or experiencing, CSE, CCE, county lines, serious violence, trafficking or modern slavery, they will report the concern to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay. Concerns will be responded to in accordance with this policy and the school's child protection procedures.
  - The initial response to a child who may be experiencing exploitation or serious violence is important. Staff will take concerns and allegations seriously, listen appropriately, avoid making assumptions and work in ways that support the child and promote their safety.
  - The DSLs will consider concerns about exploitation, serious violence, trafficking and modern slavery in the context of the child's individual circumstances, relevant local and national safeguarding guidance and any known contextual risks. The DSL will make referrals, requests for support or reports to children's social care, the police or other relevant agencies where appropriate.
  - Where appropriate, the DSLs 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, serious violence or other community safety concerns, the DSLs 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 child protection procedures will be followed. The DSLs will consider whether a referral through the National Referral Mechanism is required.

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- Safeguarding concerns will be referred to the Front Door Service and/or the police as appropriate. Where there is an immediate risk of harm or a crime is in progress, the emergency services will be contacted using 999.
- When sharing information or making a Request for Support to the Front Door Service or another appropriate agency, VIAT will provide relevant information to support an effective contextual safeguarding response. This may include information about the child's presentation, attendance, behaviour, peer and friendship relationships, online activity, family circumstances, community risks, locations of concern, transport routes, patterns of absence, known associates and any indicators of exploitation, trafficking, modern slavery or serious violence.
- Trust schools will cooperate with relevant agencies and local safeguarding arrangements in relation to the prevention and reduction of serious violence and other contextual safeguarding risks.
- Children who have experienced exploitation or serious violence may require additional support to keep them safe, recover from harm and remain engaged in education. Support will be considered on an individual basis and may involve coordinated work with children's social care, the police, health services and other relevant agencies.

### 17. So-called honour based abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with this policy. Staff will report any concerns about HBA to the DSL (or Deputy) without delay. Staff will not attempt to investigate or mediate concerns themselves.
- All staff will speak to the DSL or Deputy if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information – 0207 008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)
- While all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
  - 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 in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl;
  - It will be rare for teachers to see visual evidence, and they should not be examining pupils/students, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on how and when to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#);
  - Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL or Deputy, and Kent Integrated Services should be informed as appropriate.

### Forced marriage

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- Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats may be physical, emotional or psychological. A lack of full and free consent may also arise where a person is unable to consent, for example because of a learning disability.
- Staff must speak to their DSL or Deputy without delay if they have any concerns that a child may be at risk of forced marriage or may have experienced forced marriage. Staff should be particularly alert to concerns involving pressure from family or community members and should not attempt to mediate or involve family members where doing so could increase the risk to the child.
- Since February 2023, it has also been a criminal offence to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even where violence, threats or other forms of coercion are not used. This applies to non-binding, unofficial marriages as well as legal marriages.
- School and college staff can contact the Forced Marriage Unit (FMU) for advice or information on 020 7008 0151 or [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)
- Any immediate risk of harm will be responded to through the appropriate emergency safeguarding and/or police procedures.

### Female genital mutilation (FGM)

- 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 potentially long-lasting harmful consequences.
- All staff must speak to their DSL or Deputy if they have concerns that a child may be at risk of FGM or may have experienced FGM. Staff must follow local safeguarding procedures where FGM is suspected or where a child is considered to be at risk.
- There is a specific mandatory reporting duty for teachers. Section 5B of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers, along with regulated health and social care professionals in England and Wales, to personally report to the police where they discover, either through disclosure by the victim or visual evidence, that FGM appears to have been carried out on a girl under 18.
- Teachers must personally make the report to the police. Unless there is good reason not to, the teacher should also discuss the case with the DSL or Deputy and involve local authority children's social care as appropriate. The mandatory reporting duty does not apply to cases where FGM is only suspected or where a child is considered to be at risk but the teacher has not discovered that FGM appears to have been carried out. It also does not apply where the woman is aged 18 or over.
- It will be rare for teachers to see visual evidence of FGM and staff must not examine pupils or students. Where the mandatory reporting duty does not apply, staff must follow the school safeguarding procedures and report concerns to their DSL or Deputy without delay.

## 18. Preventing radicalisation

## Safeguarding and Child Protection Policy

- Trust schools recognise that children may be susceptible to radicalisation into terrorism and may be vulnerable to extremist ideology. Protecting children from this risk forms part of the school/college's wider safeguarding arrangements.
- The school 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 being drawn into terrorism. This is known as the Prevent duty. The school will fulfil its Prevent duty as part of its wider safeguarding responsibilities and in accordance with relevant statutory guidance and local procedures.
- 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 by which a person comes to legitimise support for, or use of, terrorist violence.
  - Terrorism includes 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.

### Identifying and responding to concerns

- Trust schools recognise that there is no single way of identifying whether a child may be susceptible to radicalisation or being drawn into terrorism. Staff will therefore remain alert to changes in a child's behaviour, presentation, language, relationships, attitudes or online activity which may indicate that they are in need of help or protection.
- This may include concerns relating to exposure to extremist or terrorist content, online radicalisation, changes in relationships or behaviour, or other indicators that a child may be vulnerable to radicalising influences. Staff will use their professional judgement and act proportionately where they have concerns.
- All concerns will be reported promptly to the Designated Safeguarding Lead (DSL) or, in their absence, a deputy DSL, in accordance with the school's safeguarding procedures.
- Trust schools will maintain an appropriate Prevent risk assessment, informed by the local context and reviewed regularly. This will consider, where relevant:
  - the local Prevent risk profile;
  - risks of online radicalisation and access to extremist or terrorist content;
  - the effectiveness of filtering and monitoring arrangements;
  - staff awareness, capability and training;
  - the use of external speakers, visitors and premises;
  - opportunities for partnership working and information sharing; and
  - local referral pathways and available support.

### Leadership, training and partnership working

- DSLs and senior leaders will be familiar with the Prevent duty, relevant national guidance and local procedures for responding to concerns and making Prevent referrals.

## Safeguarding and Child Protection Policy

- Trust schools will ensure that staff receive appropriate Prevent training so that they:
  - understand the Prevent duty and their safeguarding responsibilities;
  - understand the local risks and context;
  - can recognise signs that a child may be vulnerable to radicalisation or extremist influences;
  - know how and when to report concerns internally;
  - understand the school's Prevent risk assessment and safeguarding procedures; and
  - understand the local Prevent referral pathway.
- The DSLs will receive appropriate and sufficiently detailed Prevent training to enable them to advise staff, respond to concerns, make or support Prevent referrals where appropriate, and maintain awareness of relevant local and national developments.
- Trust schools will work, where appropriate, with safeguarding partners, the local authority, police, the Department for Education and the Kent and Medway Prevent Team to support effective Prevent arrangements.

### Prevent referrals and Channel

- Where DSLs consider that a Prevent referral may be appropriate, this will be managed in accordance with relevant Kent Prevent procedures, the Kent Support Levels Guidance, the Prevent duty guidance and other relevant national guidance.
- DSLs may seek advice from the Kent and Medway Prevent Team where appropriate. Prevent concerns will be considered within the school's wider safeguarding framework and referrals will be made where the circumstances indicate that this is necessary.
- If there is an immediate threat to a child's or another person's safety, the emergency services will be contacted by calling 999.
- Prevent referrals are assessed by the police and may be referred to a multi-agency Channel panel where appropriate. Channel is a voluntary, confidential programme which provides support at an early stage to people identified as being susceptible to being drawn into terrorism.
- A school representative may be asked to contribute to a Channel assessment or attend a Channel panel where appropriate, in accordance with information-sharing and safeguarding requirements.
- Trust schools will have regard to relevant Channel guidance and appropriate Home Office training when participating in Channel arrangements.

### Information sharing and transition

- Where a child is receiving support through Prevent or Channel and moves to a new school, college or other education setting, the DSL will share relevant safeguarding information with the DSL at the receiving setting, in accordance with the school's information-sharing procedures and applicable data protection requirements.
- This will be done in sufficient time to enable appropriate support and safeguarding arrangements to continue when the child moves to the new setting.

### Local Kent and Medway arrangements

## Safeguarding and Child Protection Policy

- Trust schools will maintain awareness of the local Prevent risk assessment, referral arrangements, training opportunities and advice available through the Kent and Medway Prevent Team and relevant safeguarding partnership arrangements.
- Trust schools will review its Prevent arrangements regularly to ensure they remain proportionate to local and emerging risks, including risks associated with online radicalisation, extremist content and changes in the local or national threat environment.

### 19. Cybercrime

- VIAT recognises that cybercrime is criminal activity committed using computers, computer networks, internet-enabled devices and/or the internet. Cybercrime can broadly be categorised as either cyber-enabled or cyber-dependent.
- Cyber-enabled crime refers to crimes that can happen offline but are enabled, increased in scale or speed through the use of technology or the internet. This may include fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online harassment, bullying 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 or computer systems (sometimes referred to as hacking), denial of service attacks or “booting”, and the making, supplying or obtaining of malware such as viruses, spyware, ransomware, botnets or Remote Access Trojans.
- Trust schools recognise that children with particular skills, interests or abilities in computing and technology may inadvertently or deliberately become involved in cybercrime, particularly cyber-dependent crime, sometimes without fully understanding the legal, ethical or safeguarding implications of their actions.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent crime, they will report their concerns to their Designated Safeguarding Lead (DSL). The DSL will consider the concern in line with this safeguarding 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 the child to the Cyber Choices programme. Cyber Choices focuses specifically on cyber-dependent crime and aims to support young people who may be at risk of committing, or being drawn into, low-level cyber-dependent offences, helping them to use their computing skills and interests in positive and lawful ways.
- Concerns relating to cyber-enabled crime, including fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online bullying, harassment or other online safety concerns, will be responded to in accordance with this safeguarding policy and the school's relevant behaviour, acceptable use, online safety and child protection arrangements.
- If a 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 through the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and relevant KSCMP procedures.

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- If a child is considered to be in immediate danger, the emergency services will be contacted by calling 999.
- Trust schools will seek to take a supportive and preventative approach, recognising that children with strong computing skills may require appropriate guidance and intervention to ensure that their abilities and interests are developed and used safely, legally and positively.

### 20. Domestic Abuse

- Trust schools 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, economic or financial, and emotional abuse, including coercive and controlling behaviour.
- Domestic abuse can take place inside or outside the home and within different types of relationships, including current or former intimate partners and family members. It can include intimate partner violence, abuse by family members, teenage relationship abuse and child or adolescent to parent violence and abuse.
- Trust schools recognise that anyone can be a victim of domestic abuse, regardless of sex, age, ethnicity, socio-economic status, sexuality, disability, background or identity.
- Trust schools recognise that children can be victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse. Children may also experience abuse within their own intimate relationships, sometimes referred to as teenage relationship abuse. Where the statutory definition of domestic abuse does not apply, this will nevertheless be treated as a safeguarding concern and responded to appropriately.
- Domestic abuse can have a detrimental and long-term impact on children's health, wellbeing, development, relationships, behaviour and ability to learn. Trust schools will consider the impact of domestic abuse as part of its assessment of the child's overall safeguarding and welfare needs.
- Trust schools recognise that domestic abuse may occur, continue or escalate during or following separation. Concerns will not be considered in isolation. Trust schools will consider the child's lived experience, family circumstances, relationships and any wider safeguarding risks.
- Domestic abuse concerns will be approached in a child-centred, trauma-informed and non-judgemental manner. Staff will avoid victim-blaming language, assumptions or responses that could discourage a child or young person from disclosing abuse or seeking help.
- Staff who are concerned that a child may be seeing, hearing or experiencing the effects of domestic abuse, or may be experiencing abuse within their own intimate relationship, must report their concerns promptly to their Designated Safeguarding Lead (DSL) or a deputy, in accordance with the school's safeguarding procedures.
- DSLs will consider concerns about domestic abuse in accordance with this policy, the procedures of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP), the Kent Support Levels Guidance and other relevant local and national safeguarding guidance. The Kent Support Levels

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Guidance provides a framework for determining the level of support required, from universal support through to statutory child protection intervention.

- Where a child or family has emerging or additional needs, Trust schools will consider whether support through Early Help/Family Help or other appropriate services is required. Where there are concerns that a child requires statutory social care support, the DSLs will consider making a Request for Support to Kent Children's Services through the appropriate Kent referral process.
- Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, Trust schools will follow child protection procedures and make an appropriate referral to Kent Children's Services and/or the police. Level 4 of the Kent Support Levels Guidance applies where there is actual or likely significant harm requiring a statutory, multi-agency response under section 47 of the Children Act 1989.
- If a child or adult is in immediate danger, the emergency services will be contacted by calling 999. Kent Children's Services advises that concerns about a child can be reported through the Kent child safeguarding referral route, with an out-of-hours service available where required.

### Operation Encompass

- Trust schools participate in Operation Encompass. Operation Encompass is a process for sharing information between the police and education settings about domestic abuse incidents which may affect children and young people. The purpose is to enable education settings to respond appropriately and provide timely support according to the child's needs. KSCMP identifies Operation Encompass as a county-wide process for notifying schools and early years settings about domestic abuse incidents affecting children.
- Police notifications may provide the schools with information about domestic abuse incidents involving a child's household or circumstances. Trust schools recognise that a child may be affected by domestic abuse even where they were not physically present when the incident occurred.
- Operation Encompass notifications will help the schools to have up-to-date and relevant information about a child's circumstances and to consider whether immediate or ongoing support is required.
- Operation Encompass does not replace the schools' statutory safeguarding responsibilities. Receipt of a notification will not, in itself, determine the school's response. DSLs will consider the information alongside all other known safeguarding information and will determine whether further safeguarding action, support or referral is required.
- Where appropriate, Trust schools will work with Kent Children's Services, Kent Police and other relevant agencies to ensure a coordinated response to the child's needs. Trust schools will follow local safeguarding procedures where there are concerns that a child may require additional support or protection.
- Operation Encompass notifications and related safeguarding information will be treated as confidential, stored securely and managed in accordance with data protection legislation and the school's child protection recording procedures. Information will be shared proportionately and on a need-to-know basis where this is necessary to safeguard and support the child.

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- The DSLs will maintain oversight of Operation Encompass notifications and will ensure that relevant information is shared with appropriate staff where necessary to safeguard and support the child. Staff will be reminded of the confidential nature of information received through Operation Encompass.
- Where a school is unsure how to respond to an Operation Encompass notification, advice will be sought from the appropriate Kent safeguarding or education safeguarding service, Kent Children's Services, Kent Police or the relevant Operation Encompass advice service.
- Trust schools will ensure that Operation Encompass arrangements are incorporated into its wider safeguarding procedures, including appropriate training, information sharing, record keeping and consideration of how children and young people affected by domestic abuse can be supported. Kent's current domestic abuse strategy specifically identifies the importance of embedding Operation Encompass within existing safeguarding processes and using trauma-informed responses.
- Trust schools recognise that domestic abuse is a safeguarding issue affecting children as well as adults. The schools will therefore respond to concerns in a way that prioritises the child's safety, welfare, voice and lived experience and considers both immediate and longer-term support needs.

### Child abduction and community safety incidents

- Trust schools 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.
- Trust schools also recognise that community safety incidents in the vicinity of the schools 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/Head of School and/or DSL immediately. Where there is an immediate risk to a child, emergency services will be contacted using 999.
- Trust schools 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.

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

- Trust schools 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

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appropriate, and working with partner agencies where this is needed to safeguard and promote the child's welfare.

- Trust schools 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, Trust schools 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.
- Trust schools 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 DSLs and responded to in line with this policy.

### Homelessness

- Trust schools recognise that being homeless, or being at risk of homelessness, can present a real risk to a child's welfare.
- The DSLs 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, Trust schools recognise that 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.

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

- Trust schools 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.

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- 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.
- Trust schools 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.

### Mental health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

### Bruising in non-mobile children

- Bruising in babies, infants or children with complex needs who 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 there is concern about actual or suspected bruising on a non-mobile child, the schools 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 (section 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 Kent Integrated Children's Services (ICS) 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 accurately describe and document, using 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 made by parents/carers, must be accurately documented, using their words wherever possible, in the child's record alongside the body map.
    - If there is a concern about the parental response to the injury, there is no explanation, or the explanation is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to Kent Integrated Children's Services (ICS) Front Door Service, which has responsibility for arranging further multi-agency assessment.
    - If there are concerns regarding the immediate safety of the child or staff, the police will be called.

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- If the setting is in any doubt about how to respond to bruising on a non-mobile child, advice may be sought from the Kent Integrated Children's Services (ICS) Front Door Service.
- Staff must follow safeguarding procedures and inform their DSL or deputy without delay where there is any concern about a child. The schools will cooperate with children's social care, health services and other safeguarding partners as required.

### 21. Supporting Children Potentially at Greater Risk of Harm

- VIAT recognises that, while all children should be protected from abuse, neglect, exploitation and harm, some children may be more vulnerable or may face additional barriers to recognising, reporting or being supported with safeguarding concerns.
- Trust schools will take a child-centred, trauma-informed and contextual approach to safeguarding, considering each child's voice, lived experience, individual circumstances and any barriers they may face in accessing help or support.
- Staff will remain alert to the needs and experiences of children who may require additional support and will report safeguarding concerns to their Designated Safeguarding Lead (DSL) or Deputy DSL in accordance with this policy.
- Children who may require particular consideration include, where relevant to the individual child and the school's local context, children who:
  - have special educational needs or disabilities (SEND);
  - have medical or physical health conditions;
  - are experiencing mental health or emotional wellbeing difficulties;
  - are asylum seekers or have experience of migration or displacement;
  - are bereaved or have experienced significant loss or trauma;
  - are in kinship care;
  - are young carers;
  - are experiencing, or may be at increased risk of, bullying, including prejudice-based bullying;
  - may be particularly vulnerable to sexual violence, sexual harassment, exploitation or other forms of child-on-child abuse; or
  - may experience additional barriers to communicating concerns or accessing support.
- Trust schools recognise that vulnerability is individual and may change over time. Staff will therefore avoid making assumptions based solely on a child's circumstances, diagnosis, background or behaviour and will remain professionally curious about any changes or concerns.
- Trust schools will consider whether additional pastoral, communication, educational or safeguarding support is required and will work with relevant professionals and agencies where appropriate.

#### Safeguarding Children with Special Educational Needs or Disabilities (SEND)

- VIAT recognises that children with special educational needs or disabilities (SEND), and children with certain medical or physical health conditions, can face additional safeguarding challenges both online and offline.

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- Additional barriers may exist when recognising abuse, neglect or exploitation. These may include:
  - assumptions that indicators of possible abuse, neglect or exploitation, such as changes in behaviour, mood or injuries, are related to a child's SEND or condition without further exploration;
  - increased vulnerability to peer group isolation or bullying, including prejudice-based bullying;
  - children with SEND or certain medical conditions being disproportionately impacted by bullying or other harmful behaviours without outwardly showing signs;
  - communication barriers or difficulties in managing or reporting concerns;
  - difficulties understanding that what is happening to them may constitute abuse, neglect or exploitation;
  - difficulties with cognitive understanding;
  - the need for intimate or personal care;
  - children being isolated from others;
  - increased dependence on adults for care and support; and
  - difficulties understanding the potential consequences of online content, behaviours or interactions.
- Staff will appropriately explore potential indicators of abuse, neglect and exploitation and will not assume that these are related to a child's SEND or medical condition.
- Any safeguarding concern involving a child with SEND will be reported to the DSL or Deputy DSL in accordance with this policy. The DSL will liaise closely with the SENCO where appropriate.
- VIAT 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 appropriate support are required to enable a child to express concerns or participate in safeguarding processes.
- Trust schools will consider whether additional pastoral support, communication support or other reasonable adjustments are required to safeguard and promote the welfare of children with SEND.
- Trust schools have intimate and/or personal care arrangements 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.

### Safeguarding Children with Medical Conditions

- VIAT recognises that children with medical conditions, including allergies and other physical health conditions, should be appropriately supported so that they can access education safely and fully.
- Trust schools will have appropriate arrangements in place for managing medical conditions, including individual healthcare plans and allergy arrangements where required.
- An incident involving the management of a child's medical condition will not automatically constitute a safeguarding concern. However, staff will report concerns to their 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.

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- This may include situations where:
  - relevant information about a child's medical condition has not been appropriately shared with the school;
  - a child is repeatedly provided with insufficient or essential medication or equipment;
  - agreed healthcare arrangements are not followed in a way that places the child at risk; or
  - there are wider concerns about the child's care, safety or welfare.
- The DSL will consider such concerns in accordance with this policy, relevant national and local safeguarding guidance and the school's medical conditions and allergy arrangements. Where appropriate, this may include seeking additional support or making a referral to relevant services.

### Children Requiring Mental Health Support

- VIAT recognises the important role schools play in supporting children's mental health and emotional wellbeing.
- Mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Children's experiences of abuse, neglect, trauma and other adverse childhood experiences can also affect their mental health, behaviour, relationships and education.
- Mental health concerns may also themselves develop into safeguarding concerns, including where there are concerns about self-harm, eating disorders, suicidal ideation or risk of suicide.
- Only appropriately trained professionals should diagnose a mental health condition. However, school staff are well placed to observe children in their day-to-day environment and identify changes in behaviour, presentation or circumstances that may indicate that a child is experiencing difficulties with their mental health or may be at risk of developing a mental health problem.
- Staff will remain alert to potential indicators, which may include:
  - significant changes in behaviour or mood;
  - withdrawal from social situations or relationships;
  - ongoing difficulties with sleep;
  - loss of interest in activities the child usually enjoys;
  - physical signs of self-harm;
  - neglecting personal care or appearance;
  - changes in attendance, engagement or attainment;
  - significant changes in relationships or emotional wellbeing; and
  - expressions of suicidal thoughts or other indications of significant distress.
- Not every child displaying these behaviours will have a mental health concern. Staff will nevertheless remain professionally curious, record concerns appropriately and report them so that children can receive appropriate support and early intervention.
- Where a member of staff has a concern about a child's mental health or wellbeing, they will follow the school's procedures for recording and reporting concerns, including reporting to their DSL where appropriate.
- Where a mental health concern is also a safeguarding concern, staff must speak to their DSL or Deputy DSL without delay. The DSL will consider the child's individual circumstances and whether support

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through universal services, community-based early help, Family Help or other appropriate services is required.

- Parents/carers will normally be informed where mental health support is required, 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 and appropriate arrangements will be made for the child to receive urgent medical attention. Where a child requires urgent mental health assistance but the situation is not an emergency, appropriate NHS support will be sought, including NHS 111 where appropriate.
- VIAT will consider locally available support for children's mental health and wellbeing. This may include school-based pastoral support, the senior mental health lead where applicable, school nursing, Mental Health Support Teams, early help/Family Help, NHS services and appropriate voluntary or specialist services.
- Trust schools will ensure that any mental health support or intervention offered is appropriate to the child's age, needs and circumstances and is safe and effective.
- Trust schools will support positive mental health and wellbeing by:
  - promoting positive mental wellbeing, emotional literacy and resilience;
  - identifying children who may be experiencing mental health difficulties at an early stage;
  - considering targeted support and early intervention where appropriate;
  - liaising with and referring to specialist services where required; and
  - providing age- and ability-appropriate education to help children understand and promote positive mental health, wellbeing and resilience.
- This may be delivered through PSHE/RSE, the wider curriculum, assemblies, pastoral provision, targeted interventions and other appropriate whole-school wellbeing activities.

### Other Children Who May Require Additional Safeguarding Support

- VIAT recognises that some children may experience additional vulnerability because of their personal circumstances, family circumstances or lived experience.
- This may include children who are:
  - asylum seekers or otherwise experiencing migration-related vulnerability;
  - bereaved or experiencing significant loss;
  - living in kinship care;
  - young carers;
  - experiencing mental health or emotional wellbeing difficulties;
  - experiencing bullying or discrimination, including racial discrimination and prejudice-based bullying;
  - potentially vulnerable to homophobic, biphobic or transphobic bullying;
  - at risk of sexual violence, sexual harassment or other harmful sexual behaviour; or
  - experiencing other circumstances that may increase their vulnerability to abuse, neglect, exploitation or harm.
- Staff will consider the individual needs and circumstances of each child and will not make assumptions about vulnerability based solely on a child's background or circumstances.

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- Where a child faces barriers to recognising, communicating or reporting a safeguarding concern, Trust schools will consider what reasonable adjustments, trusted adults, communication support, pastoral support or other measures may help the child to access safeguarding support.
- Trust schools will work with parents/carers, the DSLs, SENCOs and relevant partner agencies as appropriate to ensure that concerns are identified, recorded, shared and responded to in a timely and child-centred way.

### Children Missing Education

- Children missing education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- Patterns of absence, persistent lateness, or multiple suspensions may indicate safeguarding concerns. Staff are trained to monitor and report these patterns as part of early help processes.
- A robust response to children who are missing education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- Where possible, VIAT will hold more than one emergency contact number for each pupil/student, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern.
- Where the schools have concerns that a child has unexplainable and/or persistent absences and/or is missing from education, they will respond in line with their statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).
- Where there are concerns that a child may be missing from education, including where a school becomes aware that a child has moved out of the area or their whereabouts are unknown, Trust schools will make appropriate referrals promptly in accordance with local procedures and will not delay referral where this could prevent timely action by the local authority.
- Where absence raises welfare or safeguarding concerns, the DSLs will consider whether a referral or Request for Support to children's social care or another relevant agency is required.
- Trust schools will comply with statutory requirements concerning children missing education, including requirements to provide information to the local authority when a child is removed from the admission register at standard and non-standard transition points.
- Working Together to Improve School Attendance is statutory guidance. Trust schools will follow this guidance alongside the Children Missing Education statutory guidance and relevant local authority procedures.

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### Elective Home Education (EHE)

- Trust schools 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 schools also recognise 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, Trust schools 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.
- Trust schools 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 DSLs will consider whether a Request for Support is required.

### Alternative provision

- Where the school places a pupil/student with an alternative provision provider, the schools retain responsibility for the pupil/student's safeguarding and welfare during the placement. The schools will ensure that the placement is appropriate, safe and meets the pupil/student's individual needs.
- Trust schools recognise that pupils/students attending alternative provision may have complex needs and may be particularly vulnerable to additional safeguarding risks. Safeguarding considerations will therefore be addressed before, during and throughout the placement.
- Before agreeing a placement, Trust schools will undertake appropriate due diligence and quality assurance to satisfy itself that the alternative provision is safe, suitable and able to meet the pupil/student's needs.
- Before a placement begins, Trust schools will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the provision. The provider will also be required to provide written information about any arrangements that may affect the pupil/student's safety and to notify the schools of relevant staffing or other changes, enabling the schools to assure itself that appropriate safeguarding arrangements and checks remain in place.

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- Trust schools will maintain accurate records of where the pupil/student is receiving education during school hours. This will include the address of the alternative provision and details of any subcontracted provision, satellite sites or other locations the pupil/student may attend.
- The DSLs and relevant staff will ensure that appropriate safeguarding information is shared with the alternative provision provider, in accordance with information-sharing, confidentiality and data protection requirements. Information will be shared where necessary to safeguard and support the pupil/student effectively.
- Trust schools will regularly review alternative provision placements, at least half-termly, to provide assurance that the pupil/student is attending regularly, the placement remains safe and suitable, and the provision continues to meet the pupil/student's needs.
- Trust schools will continue to monitor the quality, safety and suitability of the alternative provision throughout the placement and will take action where the provision is no longer meeting the pupil/student's needs or safeguarding requirements.
- Where safeguarding concerns arise in relation to an alternative provision placement, Trust schools will review the placement immediately and, where necessary, suspend or end the placement unless and until the concerns have been satisfactorily addressed.
- Trust schools will respond to any safeguarding concerns relating to a pupil/student attending alternative provision in accordance with this safeguarding and child protection policy and relevant statutory guidance.

### Children who may benefit from Early Help

- Trust schools recognise that safeguarding is everyone's responsibility and that children may need additional support at any point in their lives. Any child may benefit from support before statutory intervention, including universal services and community-based Early Help or targeted early help through Family Help.
- All staff should 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 (EHCP);
  - 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;
  - has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, or is at risk of permanent exclusion from school, college, Alternative Provision or 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;

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- is in a family circumstance presenting challenges for the child, including 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, including Female Genital Mutilation (FGM) or Forced Marriage; or
  - is a privately fostered child.
- Where it is identified that a child may benefit from Early Help or Family Help, staff will follow the safeguarding procedures and inform their DSL without delay. The schools will work with children, families and relevant agencies to identify and provide the right help at the right time.

### Children who need a social worker

- Children may need a social worker due to safeguarding or welfare needs, including abuse, neglect, exploitation or complex family circumstances. Experiences of adversity and trauma may leave children vulnerable to further harm and may create barriers to attendance, learning, behaviour and mental health.
- The local authority should share the fact that a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This information will be considered as a matter of routine.
- Where a child needs or has a social worker, this will inform the schools' safeguarding and welfare decisions. This may include:
  - responding to unauthorised absence and concerns about attendance;
  - responding to children missing from education where there are known safeguarding risks;
  - considering whether changes in attendance, behaviour or presentation indicate an emerging or increased safeguarding concern;
  - providing appropriate pastoral, wellbeing and/or academic support;
  - contributing to and supporting statutory social care plans and interventions; and
  - working with children's social care and other relevant agencies to promote the child's safety, welfare and educational outcomes.
- The DSLs will maintain appropriate information about children who need or have a social worker and will ensure that information is shared with relevant staff and agencies on a need-to-know basis, in accordance with safeguarding and data protection requirements.
- Having a social worker will not, in itself, determine how a child is treated or supported. The school/college will consider the child's individual circumstances, needs, wishes and best interests when making safeguarding, pastoral, attendance and educational decisions.
- All staff should understand the procedures for accessing and responding to Early Help, Family Help and statutory children's social care services. Staff should speak to their DSL or deputy DSL whenever they are concerned that a child may need additional support or may be at risk of harm.

### Looked after children, previously looked after children and care leavers

- VIAT recognises that the most common reason for children becoming looked after is as a result of abuse and/or neglect. Trust schools also recognise that looked after and previously looked after

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children may remain particularly vulnerable and that children in kinship care may also require additional support and safeguarding consideration.

- Trust schools will ensure that staff have the skills, knowledge and understanding necessary to safeguard and promote the welfare of looked after children and previously looked after children. Where safeguarding concerns arise for a child who is looked after, previously looked after, in kinship care or a care leaver, Trust schools will consider safeguarding action alongside existing care planning, education planning and support arrangements.
- Trust schools have appointed a designated teacher for looked after and previously looked after children. The designated teacher will work with local authorities, including the relevant Virtual School Head, to promote the educational achievement of registered pupils who are looked after or previously looked after. The designated teacher will also work closely with relevant professionals to support the educational and safeguarding needs of these children.
- The designated teacher will work closely with their DSL to ensure that appropriate staff have the information they need about a child's looked after legal status, including whether the child is looked after under voluntary arrangements with parental consent or under an interim or full care order, where relevant. Staff who need to know will also have appropriate information about the child's contact arrangements with birth parents or others with parental responsibility, care arrangements and the level of authority delegated to the carer by the local authority.
- Where a child is looked after, DSLs will hold details of the child's social worker and the name of the Virtual School Head in the local authority that looks after the child. This information will be shared appropriately with staff who need it to safeguard and support the child.
- Trust schools recognise that Virtual School Heads have a non-statutory responsibility to promote the educational achievement of children in kinship care. Trust schools will work with the relevant Virtual School Head and local authority where appropriate to support children in kinship care.
- Where a child is a care leaver, the DSL will hold details of the local authority Personal Adviser appointed to guide and support them and will liaise with the Personal Adviser as necessary regarding any safeguarding or welfare concerns affecting the care leaver.
- Where schools become aware that a child may be subject to a private fostering arrangement, they will notify the local authority so that the arrangement can be assessed to ensure that it is suitable and safe for the child. Private fostering may apply where a child under 16, or under 18 if the child is disabled, is cared for and provided with accommodation by someone who is not their parent, a person with parental responsibility or a relative, for 28 days or more.
- Where the schools are directly involved in arranging a private fostering arrangement, they will notify the local authority as soon as possible and in accordance with the relevant statutory requirements.

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

- Trust schools 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 may sometimes be vulnerable to discriminatory bullying, prejudice, harassment or other harmful behaviour.

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- The school also recognises 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 lesbian, gay or bisexual.
- Staff will be alert to the possibility that children who are lesbian, gay or bisexual, or who are perceived to be, may face additional barriers to sharing concerns, particularly where they do not have a trusted adult with whom they can speak openly.
- Trust schools will provide a safe, respectful and inclusive environment in which children can speak openly, share concerns and be taken seriously. Staff will listen to children and remain professionally curious where there are concerns about their welfare or safety.
- Trust schools will take steps to prevent and respond to discriminatory bullying, prejudice, harassment and harmful behaviour. This will be addressed through the school's safeguarding, behaviour, anti-bullying, curriculum and pastoral arrangements, including appropriate sanctions where necessary.
- Appropriate education will be provided through the school's Relationships Education, Relationships and Sex Education and Health Education curriculum, in accordance with statutory guidance, to promote respectful relationships, inclusion and the prevention of prejudice-based and discriminatory bullying.
- Where a safeguarding or welfare concern is identified, staff will report the concern to the Designated Safeguarding Lead (DSL) in accordance with this policy.

### Children who are questioning their gender

- Trust schools recognise that some children may question the way they feel about being a boy or a girl, including their physical attributes and the related ways in which they fit into society.
- Children may express themselves in ways that are less typically associated with their sex. This is not, in itself, a safeguarding concern. Staff will avoid making assumptions based on appearance, behaviour, interests or presentation and will consider the individual circumstances of each child.
- Trust schools will be a respectful environment where bullying, harassment, discrimination and harmful behaviour are not tolerated. Staff will remain alert to potential vulnerabilities affecting children who are questioning their gender, including discriminatory bullying, difficulties within family or peer relationships, online harm, mental health or psychosocial needs and other safeguarding concerns.
- Staff will take time to listen to and understand the child's thoughts, feelings and experiences and will remain professionally curious about the full range of the child's circumstances and relationships.
- Trust schools will not initiate any action regarding social transition. This policy applies where a child or their parent/carer raises a request for support or changes relating to social transition.
- Where a child or parent/carer requests support with social transition, Trust schools will take a very careful, considered and safeguarding-led approach. Trust schools will consider what is in the best interests of the child and the impact of any proposed arrangements on other children.
- Any decision regarding social transition may not be the same as the child's wishes. Trust schools will consider the child's views and lived experience alongside its safeguarding duties, equality and human rights obligations, and the welfare and best interests of the child and other children affected.

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- Parents/carers will normally 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 would constitute a greater risk of harm to the child, the DSL will be involved before parents/carers are contacted or any decision is made.
- Trust schools will consider relevant information and advice when making decisions, which may include information from parents/carers, the DSL, SENCO, mental health lead, pastoral staff, clinical professionals or other appropriate professionals, depending on the individual circumstances.
- Trust schools will ensure that its decision-making process is documented and that appropriate records are maintained. Any agreed arrangements will be kept under review because the circumstances, needs or wishes of a child may change over time.
- Where a child confides in a member of staff about their feelings 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 involve their DSL and parents/carers where appropriate.
- Trust schools will take particular care when considering requests involving primary-aged children and will recognise the importance of early clinical advice where families are considering social transition for pre-pubertal children. Staff will not attempt to provide clinical advice or make clinical judgements.
- Trust schools will maintain flexibility and avoid rigid rules based on gender stereotypes. Any arrangements will be considered on an individual basis and reviewed where circumstances change.
- In accordance with KCSIE, Trust schools will not allow children to use toilets, changing rooms or boarding or residential accommodation designated for the opposite sex. Where appropriate, Trust schools will consider whether alternative facilities or arrangements can be provided without compromising the safety, comfort, privacy or dignity of the child or other children.
- Where a school operates single-sex sport where this is necessary for safety reasons, there will be no exceptions to those arrangements. Any other request concerning participation in PE or sport will be considered in accordance with KCSIE and the school's relevant policies.
- Trust schools will ensure that records relating to a child are accurate. Relevant staff will have access to information necessary to safeguard and support the child, with information shared appropriately and on a need-to-know basis in accordance with safeguarding, confidentiality and data protection requirements.
- Trust schools will be particularly alert to the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth, where other pupils or staff may be unaware of their biological sex. The DSLs will be involved in such cases, particularly where safeguarding concerns arise or as the child approaches puberty.
- Where a child wishes to fully or partially reverse a previous arrangement relating to social transition, Trust schools will consider the child's circumstances carefully and work with parents/carers and relevant professionals, where appropriate, to ensure that the child is supported.

## Safeguarding and Child Protection Policy

- If staff have concerns about a child who is questioning their gender, including concerns relating to bullying, mental health, family relationships, online harm, self-harm, exploitation or any other safeguarding issue, they will report these concerns to their DSL in accordance with this policy.
- Where a safeguarding or welfare concern is identified, the DSLs will consider whether a Request for Support or other appropriate referral should be made.
- Transitional safeguarding for young people aged 18+
- Trust schools recognise that safeguarding needs do not automatically end when a young person reaches the age of 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 their DSL in accordance with this policy.
- DSLs will consider the concern in accordance with relevant safeguarding procedures, taking account of the young person's wishes and views, mental capacity, consent, risk and the need to share information to prevent or respond to harm.
- DSLs will consider which safeguarding or support pathway is most appropriate. This may include support within the school, adult safeguarding, health services, mental health services, housing services, the police, Prevent or other relevant local services.
- Where appropriate, Trust schools will make a referral to Kent Adult Social Care in accordance with local adult safeguarding procedures. Relevant information and referral routes are available through Kent Adult Social Care, including the Kent Adult Safeguarding Concern Form. The school may also seek information and guidance from the Kent and Medway Safeguarding Adults Board.
- Where a 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 children's and adult services, Trust schools will consider how information can be shared appropriately to support continuity of safeguarding and support.
- Trust schools will work with relevant services and professionals, where appropriate, to support a safe transition between children's and adult services and to reduce the risk of gaps in safeguarding or support.
- Information will be shared appropriately and lawfully where this is necessary to safeguard the young person or others. Trust schools will take account of consent, confidentiality, mental capacity and the circumstances in which information may need to be shared without consent to prevent or respond to a risk of harm.
- Where there is an immediate risk of serious harm, the appropriate emergency services will be contacted. Safeguarding decisions, including the rationale for actions taken or not taken, will be recorded in accordance with the school's safeguarding and record-keeping procedures.

## 22. Children who are Privately Fostered

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- [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. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of the school, we must notify Kent Integrated Children's Services 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.

### 23. Online Safety

- Trust schools recognise that children can be exposed to significant safeguarding risks through the use of technology, the internet, digital devices, online platforms, applications and artificial intelligence. Online safety is therefore an essential part of safeguarding and child protection.
- Trust schools will adopt a whole-school approach to online safety which empowers, protects and educates children and staff in their use of technology and establishes effective arrangements to identify, intervene in and escalate concerns.
- Online safety will be a running and interrelated theme across the school's safeguarding arrangements, policies and procedures, curriculum, staff training, leadership and governance, acceptable use arrangements, mobile and smart technology arrangements, filtering and monitoring, information security, artificial intelligence and parental engagement.
- Trust schools will maintain an attitude that online harm could happen here. Any concern about a child's online safety, digital activity or use of technology will be taken seriously and reported to the Designated Safeguarding Lead (DSL) or deputy in accordance with this policy.

#### Areas of Online Risk

- Trust schools recognise that online risks are continually evolving. For safeguarding purposes, online risks will be considered under four broad areas:
  - Content – children being exposed to illegal, inappropriate or harmful material, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation including fake news, and conspiracy theories.
  - Contact – children experiencing harmful interaction with other users or with generative artificial intelligence applications that simulate human interaction. This may include peer pressure, bullying, harassment, commercial advertising, manipulation, grooming and adults pretending to be children or young people in order to exploit children for sexual, criminal, financial or other purposes.
  - Conduct – online behaviour which increases the likelihood of, or causes, harm. This includes cyberbullying, harassment, abusive or discriminatory behaviour, sharing harmful or inappropriate material, and making, sending or receiving explicit images, including images generated or manipulated using artificial intelligence.

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- Commerce – risks associated with online financial activity, including online gambling, inappropriate advertising, phishing, scams, fraud, financial exploitation and other attempts to obtain money or personal information from children.
- Trust schools will consider these risks both when children are using technology within school and where online activity outside school has an impact on a child's safety, wellbeing, relationships, attendance or education.

### Leadership and Responsibilities

- The Local School Boards and school leadership will ensure that online safety is embedded within the school's wider safeguarding arrangements and that appropriate policies, procedures, systems, training and monitoring are in place.
- The DSLs have lead responsibility for online safety as part of their safeguarding role and will:
  - understand the school's filtering and monitoring arrangements and how these operate in practice;
  - receive and act upon relevant filtering and monitoring reports;
  - ensure online safety concerns are appropriately recorded and responded to;
  - work with senior leaders and technical staff or providers to identify and address online safety risks;
  - ensure concerns are escalated where necessary;
  - ensure emerging online risks are considered within safeguarding risk assessments;
  - contribute to the annual review of online safety and filtering and monitoring arrangements; and
  - ensure that online safety education and safeguarding responses are appropriate to children's age, ability, needs and vulnerabilities.
- Senior leadership teams will ensure that appropriate resources, systems, training and staff capacity are available to support effective online safety.
- Technical staff or service providers will have responsibility for maintaining the schools' filtering, monitoring and information-security systems and will work with school leaders and the DSLs to identify, investigate and resolve technical or safeguarding concerns.
- All staff are responsible for:
  - following the school's online safety, acceptable use, safeguarding and behaviour arrangements;
  - completing required online safety and safeguarding training;
  - supervising children's use of technology appropriately;
  - reporting online safety concerns promptly to the DSL or deputy;
  - reporting suspected filtering or monitoring failures;
  - using school technology responsibly and securely; and
  - maintaining professional boundaries when communicating or interacting online.

### Use of Technology

## Safeguarding and Child Protection Policy

- Trust schools use a range of digital technologies to support teaching, learning, communication and administration. These may include computers, laptops, tablets, interactive technology, internet services, email, learning platforms, cloud services, applications and other digital systems.
- All school-owned devices, systems and networks must be used in accordance with the school's acceptable use, safeguarding, behaviour, data protection and information-security arrangements.
- Technology will be selected and used with consideration of:
  - safeguarding;
  - age appropriateness;
  - educational value;
  - accessibility;
  - children's individual needs and vulnerabilities;
  - data protection and privacy;
  - information security;
  - filtering and monitoring capability;
  - the risks associated with artificial intelligence; and
  - any relevant legal or regulatory requirements.
- Children will be supervised when using technology in accordance with their age, developmental stage, ability, needs and identified safeguarding risks.

### Generative Artificial Intelligence

- Trust schools recognise that generative artificial intelligence (AI) can provide educational and administrative benefits when used safely, appropriately and lawfully. However, AI also creates safeguarding, privacy, data protection, intellectual property, information-security and educational risks.
- AI-related risks include:
  - exposure to harmful, inaccurate, misleading or biased material;
  - bullying, harassment, abuse or exploitation;
  - harmful interactions with AI applications;
  - the creation or manipulation of images, including deepfakes and digitally altered images;
  - the creation or sharing of nude or semi-nude images;
  - privacy and data protection breaches;
  - inappropriate collection or disclosure of personal or confidential information;
  - intellectual property infringement;
  - plagiarism and cheating;
  - inappropriate reliance on AI-generated information; and
  - other harmful or unethical uses of AI.
- Trust schools will ensure that staff and children are educated about the benefits and risks of AI and understand the expectations for its safe and responsible use.
- Generative AI tools will not be used for school purposes unless they have been approved through appropriate assessment and approval arrangements. The assessment will consider safeguarding, age appropriateness, educational purpose, data protection, privacy, confidentiality, security, accuracy, bias, intellectual property, academic integrity, filtering and monitoring and the provider's relevant safety arrangements.

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- A Data Protection Impact Assessment (DPIA) will be completed where required.
- Trust schools will maintain appropriate oversight of approved AI tools and will review their continued suitability where there are significant changes to functionality, risks, data processing or the way in which the tool is used.
- Staff and children must not enter confidential, sensitive or personal information into an AI tool unless this has been specifically authorised and the relevant data-protection requirements have been satisfied.
- 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. Appropriate arrangements must be in place concerning confidentiality, consent, data protection, security, storage and access to information.
- Images of children or staff must not be uploaded to, generated by, manipulated through or shared using AI tools unless this has been specifically approved and is consistent with the school's safeguarding, image-use, consent and data-protection arrangements.
- Any misuse of AI will be dealt with in accordance with the school's safeguarding, behaviour, anti-bullying, acceptable use, data protection and other relevant policies.
- Concerns involving AI-generated or digitally manipulated content, including deepfakes, harmful impersonation, bullying, harassment, abuse, exploitation or nude/semi-nude imagery, will be reported to the DSLs and managed in accordance with this policy and relevant national and local safeguarding procedures.
- Where AI is suspected to have been used to create or facilitate Child Sexual Abuse Material (CSAM), Trust schools will follow its child protection procedures and relevant national safeguarding guidance, including guidance concerning the sharing of nudes and semi-nudes.

### Mobile Phones, Smart Devices and Wearable Technology

- Trust schools recognise the safeguarding risks associated with mobile phones, smart devices and wearable technology, including devices capable of accessing the internet, sending or receiving messages, recording images, audio or video, sharing location information or connecting to mobile networks.
- Trust schools will operate as a mobile phone-free environment by default.
- Children will not have access to mobile phones during the school day, including during lessons, transition times, breaktimes and lunchtimes, except where an agreed and appropriate exception applies.
- Any exception will be determined by the school in accordance with safeguarding, behaviour, accessibility, reasonable adjustment and individual need.
- The schools' expectations regarding mobile phones and smart devices will be communicated clearly to children, staff, parents and visitors.

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- Safeguarding concerns involving mobile phones, smart devices or wearable technology will be reported to the DSL and dealt with in accordance with this policy.
- A school's arrangements will not prevent a child from reporting a safeguarding concern. Where a child needs to report a message, image, video, post or other online material, staff will support the child appropriately and avoid unnecessary viewing, copying or sharing of harmful or illegal material.

### Filtering and Monitoring

- Trust schools will do all that is reasonably practicable to limit children's exposure to illegal, inappropriate and harmful online content through school devices, systems and networks.
- Appropriate filtering and monitoring systems will be maintained as part of the school's wider safeguarding arrangements.
- Filtering and monitoring are distinct but complementary safeguards:
  - Filtering is preventative and controls access to illegal, inappropriate or harmful content and services.
  - Monitoring observes and reports activity so that safeguarding concerns can be identified and acted upon.
- The schools' filtering and monitoring arrangements will be informed by its safeguarding risk profile, including:
  - the age and ability of children;
  - children who may be at greater risk of harm;
  - children's patterns of technology use;
  - the devices and systems used;
  - applications and cloud services;
  - remote access;
  - any permitted personal-device use;
  - the school's Prevent risk assessment;
  - emerging online risks; and
  - the capabilities and limitations of the technology used.
- Filtering and monitoring will be considered across relevant websites, applications, cloud services, embedded browsers, mobile devices, remote access arrangements and generative AI services where applicable.
- Trust schools recognise that no filtering or monitoring system is completely effective. Technical limitations will therefore be identified, recorded and mitigated through supervision, education, staff training, appropriate policies and safeguarding procedures.
- Filtering will be configured to block harmful and inappropriate content without unreasonably restricting teaching, learning or safeguarding education.
- Monitoring arrangements will be proportionate to the school's age range, technology use and safeguarding risk profile and will allow concerns to be identified and acted upon in a timely manner.

#### 4.6.1 Filtering and Monitoring Responsibilities

## Safeguarding and Child Protection Policy

- The Local School Boards will provide strategic oversight of the school's filtering and monitoring arrangements.
- The senior leaders responsible for filtering and monitoring will work with the DSLs and technical staff or services provider to ensure that:
  - appropriate systems are in place;
  - responsibilities are clearly allocated;
  - systems remain operational;
  - safeguarding risks are considered;
  - concerns are escalated appropriately;
  - appropriate records are maintained; and
  - the effectiveness of the arrangements is reviewed.
- The DSLs will oversee the safeguarding aspects of filtering and monitoring, including reviewing relevant reports and responding to identified safeguarding concerns.
- Technical staff or service providers will:
  - maintain the filtering and monitoring systems;
  - provide relevant reports;
  - investigate technical failures;
  - implement agreed technical actions;
  - support system reviews and checks; and
  - inform their DSL and senior leaders of significant limitations or failures.
- All staff will receive information about their responsibilities for filtering and monitoring as part of safeguarding and online safety training.

### Reviewing Filtering and Monitoring

- The Trust will review the effectiveness of its filtering and monitoring provision across its schools at least once every academic year.
- The review will involve the senior leader responsible for filtering and monitoring at each school, the DSL and appropriate technical support. Appropriate governance oversight will also be provided.
- The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations.
- Records of checks will be retained and will include:
  - the date of the check;
  - who completed the check;
  - the devices, systems, accounts or locations tested;
  - what was tested;
  - any issues identified;
  - actions required; and
  - the outcome of those actions.
- Additional checks will be undertaken where appropriate following:

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- a safeguarding incident;
  - a significant filtering or monitoring concern;
  - introduction of new devices or systems;
  - changes to technology or working practices;
  - changes to remote access arrangements;
  - introduction of new applications or AI tools;
  - significant changes in the school's safeguarding risk profile; or
  - relevant changes to national or local guidance.
- Trust schools will not rely solely on assurances from a filtering or monitoring provider. Trust schools will undertake appropriate checks to establish that systems operate effectively in practice.
- Any technical concern will be reported to the appropriate technical staff or provider. Any safeguarding concern will be reported immediately to the DSLs and managed according to safeguarding procedures.

### Responding to Filtering or Monitoring Alerts

- Where filtering or monitoring identifies a concern relating to a child, the concern will be reported to the DSL and considered in accordance with the school's safeguarding, behaviour and acceptable use procedures.
- Where the concern relates to a member of staff, it will be dealt with under the relevant school's staff behaviour, allegations or other relevant procedures.
- Where an alert indicates an immediate risk of significant harm or potentially illegal activity, Trust schools will take immediate safeguarding action and contact relevant external agencies where appropriate.
- Parents/carers will normally be informed where a safeguarding concern involving their child has been identified, unless doing so would place the child at increased risk or compromise a safeguarding or criminal investigation.

### Information Security and Access Management

- Trust schools recognise that information security and cyber security are part of their wider safeguarding responsibilities.
- Appropriate measures will be maintained to protect:
  - children's personal information;
  - safeguarding records;
  - staff information;
  - school systems;
  - accounts and passwords;
  - devices;
  - networks; and
  - other confidential information.
- Trust schools will take reasonable steps to strengthen cyber resilience, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks.

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- Security arrangements will include appropriate controls relating to:
  - passwords;
  - account access;
  - user permissions;
  - secure authentication;
  - multi-factor authentication where appropriate;
  - software updates;
  - malware protection;
  - secure storage;
  - backups;
  - device security;
  - access to safeguarding information; and
  - reporting and responding to cyber-security incidents.
- Staff must report suspected or actual data breaches, phishing, malware, compromised accounts, lost or stolen devices, inappropriate access, cyber attacks or other information-security concerns promptly in accordance with their school's procedures.
- Information-security arrangements will be reviewed periodically and following significant incidents, changes to systems or technology, or relevant changes to national guidance.

### Remote Learning

- Where a school provides remote learning, it will be delivered in accordance with safeguarding, online safety, acceptable use, behaviour, privacy, data protection and information-security requirements.
- Staff will use school-approved systems, accounts and communication methods when providing remote learning or communicating with children and families.
- Staff must not use personal accounts or unauthorised platforms for communication with children.
- Children, parents/carers and staff will be encouraged to report safeguarding or online safety concerns arising during remote learning.
- Any safeguarding concern identified during remote learning will be reported to the DSLs and managed in accordance with this policy.

### Online Safety Training for Staff

- Online safety will form part of each school's safeguarding and child protection training.
- All staff will receive online safety training:
  - at induction;
  - through regular safeguarding updates; and
  - at least annually as part of ongoing safeguarding training.

Training will include, as appropriate:

- the four areas of online risk;
- online abuse and exploitation;

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- cyberbullying;
  - child-on-child abuse online;
  - sharing of nudes and semi-nudes;
  - AI and AI-generated content;
  - misinformation and disinformation;
  - filtering and monitoring;
  - acceptable use;
  - mobile and smart technology;
  - information security;
  - reporting and escalation procedures; and
  - the staff member's specific safeguarding responsibilities.
- Role-specific training will be provided where necessary for the DSLs, senior leaders, technical staff and other staff with specific online safety responsibilities.

### 4.10 Educating Children About Online Safety

- Trust schools will provide age- and developmentally appropriate online safety education which enables children to understand online risks, make safer choices, seek help and report concerns.
- Online safety will be taught through the curriculum and wider safeguarding education, including Relationships and Health Education and other appropriate curriculum and pastoral opportunities.
- Education will address the four areas of online risk and will include, as appropriate:
  - safe and respectful online behaviour;
  - cyberbullying;
  - online friendships and contact;
  - grooming and exploitation;
  - privacy and personal information;
  - passwords and account security;
  - misinformation and disinformation;
  - conspiracy theories and critical evaluation of information;
  - online advertising and scams;
  - financial safety;
  - harmful online challenges and hoaxes;
  - pornography and inappropriate content;
  - sharing images;
  - deepfakes and AI-generated images;
  - making and sharing nudes and semi-nudes;
  - harmful online relationships;
  - misogynistic and other harmful online influences;
  - artificial intelligence and responsible AI use;
  - digital wellbeing; and
  - how and where to report concerns and obtain help.
- Online safety education will be adapted where necessary to meet the needs of individual children, including children with SEND and children who may be at greater risk of online harm.
- Trust schools will use emerging safeguarding concerns, incidents, pupil feedback and relevant national or local intelligence to update and contextualise online safety education.

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### 4.11 Working with Parents and Carers

- Trust schools will work in partnership with parents and carers to promote children's online safety.
- Trust schools will provide parents and carers with appropriate information about:
  - online risks;
  - safe and responsible technology use;
  - the school's filtering and monitoring arrangements;
  - mobile phone and smart technology expectations;
  - the use of AI and other digital technologies;
  - the online platforms and services children may be asked to use;
  - how children can report concerns; and
  - how parents and carers can raise concerns with the school.
- Parents/carers will be encouraged to discuss online safety with their children and to support appropriate boundaries and supervision at home.
- Where online safety concerns arise involving a child, parents or carers will normally be informed and involved unless doing so would place the child at increased risk of harm or compromise a safeguarding or criminal investigation.
- Where a school becomes aware of harmful online challenges, hoaxes, trends or emerging risks, it will respond proportionately and avoid unnecessarily amplifying harmful content.

### Reporting and Responding to Online Safety Concerns

- Children are encouraged to report online safety concerns to a trusted adult.
- Staff must report concerns to their DSL or deputy without delay.
- Trust schools will respond to online safety concerns in accordance with this policy and other relevant policies, including:
  - child protection and safeguarding;
  - behaviour;
  - anti-bullying;
  - staff behaviour;
  - acceptable use;
  - mobile phone and smart technology;
  - data protection;
  - information security; and
  - complaints procedures.
- Trust schools will consider the individual circumstances, age, developmental stage, needs and vulnerabilities of the child when deciding how to respond.
- Where necessary, concerns will be escalated to relevant safeguarding partners, the police or other appropriate agencies.

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- Trust schools will support affected children and will consider the impact of online harm on their safety, wellbeing, relationships, attendance and education.

### 4.13 Reviewing Online Safety

- Trust schools recognise that technology and online harms change rapidly.
- Trust schools will review their overall approach to online safety at least annually and will support the reviews with an appropriate safeguarding risk assessment.
- The reviews will consider:
  - current online risks;
  - safeguarding incidents and concerns;
  - pupil voice;
  - staff feedback;
  - parent and carer feedback;
  - curriculum provision;
  - staff training;
  - filtering and monitoring assurance;
  - mobile phone and smart technology;
  - artificial intelligence;
  - remote learning;
  - information security and cyber security;
  - acceptable use arrangements;
  - emerging online trends and harms; and
  - the effectiveness of reporting and response arrangements.
- Trust schools will use the findings of the reviews to identify strengths, address gaps and improve its safeguarding arrangements.
- Significant emerging online risks will be considered before the next annual review where necessary.
- The Local School Boards and school leadership will receive appropriate assurance that the school's online safety arrangements are effective, reviewed and aligned with current safeguarding requirements.

## 24. Staff Engagement and Expectations

### Awareness, Induction and Training

- All staff, including those who do not work directly with children, will be provided with and required to read Part One of the current version of KCSIE.
- The Designated Safeguarding Leads (DSL), deputies, Executive Headteachers/Headteachers/Heads of School and relevant senior leaders will read the full version of KCSIE to ensure they understand the statutory safeguarding requirements.
- Staff will also be directed to any additional sections of KCSIE, local safeguarding procedures and relevant policies that apply to their role and responsibilities.

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- All staff will confirm that they have read and understood the safeguarding guidance and information provided to them. This confirmation will be recorded through the appropriate local system.
- All staff will have access to this policy and are expected to read and understand it. Staff will re-read the policy at least annually and following significant updates.
- Safeguarding arrangements and reporting procedures will form part of staff induction. This will include:
  - this Safeguarding and Child Protection Policy;
  - the behaviour policy, including arrangements to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying;
  - the Staff Behaviour Policy/Code of Conduct, including expectations regarding professional boundaries, low-level concerns, allegations against adults, whistleblowing, acceptable use of technology and communication with children;
  - safeguarding arrangements for children who are absent from education;
  - the role and identity of the DSL and deputy DSLs; and
  - procedures for reporting safeguarding concerns, including concerns about children, adults, safeguarding practice and online safety.
- All new staff and volunteers, including agency, supply and third-party staff where appropriate, will receive safeguarding and child protection training as part of induction. This will include online safety and relevant responsibilities relating to filtering and monitoring.
- Induction will ensure that staff understand local safeguarding procedures, how to identify, report, respond to and record concerns, the role of the DSL and how to access relevant local safeguarding services.
- All staff will receive safeguarding and child protection training, including online safety, which will be updated at least annually. Further safeguarding updates will be provided throughout the year as required.
- Online safety will form part of the wider safeguarding approach and staff training. This will include responsibilities relating to online safety, acceptable use, mobile phones and smart devices, filtering and monitoring, reporting concerns and responding to online safety incidents.
- Staff will be given opportunities to contribute to safeguarding arrangements and identify learning from safeguarding concerns, reviews, audits, incidents and debriefs.
- Governors/trustees or other relevant governing representatives will receive appropriate safeguarding and child protection training, including online safety, at induction and through regular updates. This will support them to provide effective strategic challenge and assurance regarding safeguarding arrangements.
- Safeguarding training requirements will have regard to the Teachers' Standards where applicable.
- The DSLs and Executive Headteachers/Headteachers/Heads of School will maintain an up-to-date record of safeguarding and child protection training undertaken by staff and relevant

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governors/trustees and will report on training arrangements through appropriate governance arrangements.

### Safer Working Practice

- Appropriate policies and procedures will 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. These include 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 procedures for reporting and responding to concerns about adults working with children, including allegations, low-level concerns and whistleblowing.
- Staff will follow the relevant behaviour and physical intervention procedures. Behaviour will be managed effectively to provide a safe educational environment, and any physical intervention or reasonable force will be consistent with policy and national guidance.
- Staff will be made aware of the professional risks associated with social media, personal devices and electronic communication, including email, mobile phones, messaging, texting and social networking. Relevant acceptable-use, staff conduct, data protection and technology procedures will be followed.

### Supervision and Support

- Appropriate supervision, guidance and support will be provided so that staff can fulfil their safeguarding responsibilities effectively.
- Staff will be supported to understand their safeguarding responsibilities and when and how to seek advice from their DSL.
- The DSLs will provide advice, guidance and debriefing to staff where appropriate and provide opportunities to discuss safeguarding concerns.
- Safeguarding work can be complex and emotionally demanding. Staff affected by concerns about children's welfare or safety can seek support from their DSL, Executive Headteacher/Headteacher/Head of School or another appropriate senior leader.
- Where appropriate, staff may be signposted to external professional support, including their union or other relevant professional support services.
- Where Early Years Foundation Stage provision is provided, appropriate supervision arrangements will be maintained in accordance with current EYFS requirements.

## 25. Safer Recruitment and Allegations

## Safeguarding and Child Protection Policy

This section sets out the approach to safer recruitment, safeguarding checks, safer working practice and the management of concerns or allegations about adults working with children. It should be read alongside the relevant Staff Behaviour Policy/Code of Conduct, low-level concerns procedures, whistleblowing procedure, managing allegations procedures and HR arrangements.

### Safer Recruitment and Safeguarding Checks

- We are committed to developing a safe culture and taking all reasonable steps to recruit, engage and deploy staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party workers who are safe and suitable to work with or around children.
- We will follow Part Three of KCSIE and relevant Disclosure and Barring Service (DBS) guidance when recruiting and engaging individuals who may work with or around children.
- Governors, trustees and leadership teams are responsible for ensuring that safer recruitment processes are followed in accordance with statutory guidance.
- Safer recruitment, safeguarding checks and related decisions will be undertaken fairly, proportionately and in accordance with safeguarding duties and applicable equality and data protection requirements.
- At least one person involved in conducting interviews will have completed appropriate safer recruitment training.
- An accurate Single Central Record (SCR) will be maintained in accordance with statutory guidance.
- Where required, relevant professional status, prohibition, restriction, sanction and direction checks will be completed in accordance with Part Three of KCSIE.
- Relevant requirements relating to the Childcare Disqualification Regulations 2009 and the Childcare Act 2006 will be followed where applicable.
- Roles, including volunteer roles, will be assessed to determine whether they constitute regulated activity. Appropriate safeguarding checks will be completed before individuals commence work or volunteering, where required.
- Staff and other adults working in or on behalf of the organisation are expected to disclose information that may affect their suitability to work with children. This may include convictions, cautions, court orders, reprimands, warnings or other relevant safeguarding information. Information arising during employment will also be considered where relevant.
- Information relating to suitability will be managed proportionately and in accordance with safeguarding, HR, data protection and LESAS/LADO requirements.
- Where a child is placed with an alternative provision provider, appropriate safeguarding assurance will be obtained before the placement starts, including confirmation that relevant safeguarding checks have been completed for individuals working at the provision.

## Safeguarding and Child Protection Policy

- Where work experience placements are organised, relevant advice and guidance in Part Three of KCSIE will be followed, including consideration of supervision arrangements, safeguarding responsibilities and any checks required.
- Where homestays or exchange visits are organised, relevant advice and guidance in Part Three of KCSIE and other applicable national guidance will be followed.

### **Allegations or concerns about adults working with children**

- Clear processes will be maintained for managing any safeguarding concern or allegation about an adult working in or on behalf of the organisation. This includes staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party workers or organisations.
- Concerns and allegations will be managed in accordance with Part Four of KCSIE and applicable local allegations management arrangements. This includes concerns that meet the harm threshold and concerns that do not meet the harm threshold, commonly referred to as low-level concerns.
- The organisation will work with relevant agencies, including the LESAS/Local Authority Designated Officer (LADO), where appropriate.
- Concerns and allegations will be recorded and managed appropriately. Effective management protects children and also protects adults from false allegations, misunderstandings and unsafe practice being left unaddressed.
- Where a safeguarding concern or allegation is raised about an adult working with children, it will be referred to the Headteacher, who will consider whether a referral to LESAS/LADO is required.
- Where the concern or allegation relates to the Executive Headteacher/Headteacher/Head of School, or where there is a conflict of interest, it will be referred to the appropriate governing representative, who will contact LESAS/LADO. Where there is a conflict of interest involving that person, the concern will be reported directly to LESAS/LADO.
- Where the Executive Headteacher/Headteacher/Head of School is unsure how to respond, including where it is unclear whether a concern meets the harm threshold, advice will be sought from LESAS/LADO.
- Where a concern relates to a supply teacher, trainee teacher, contractor, volunteer, agency worker or other third party, the relevant employer, agency, training provider or organisation will be involved as appropriate. This will not remove the organisation's responsibility to take appropriate safeguarding action, record decisions and involve LESAS/LADO where required.
- Safeguarding action will not be delayed while employment, placement or contractual responsibilities are clarified.
- Following the conclusion of allegations or low-level concerns, the Executive Headteacher/Headteacher/Head of School and, where involved, LESAS/LADO will consider whether there are lessons to be learned or improvements required to safeguarding practice, policy, training, supervision or safer working arrangements.

## Safeguarding and Child Protection Policy

- Where an allegation relates to an incident that occurred while an individual or organisation was using premises for activities involving children, safeguarding procedures will be followed and the LADO informed where appropriate.

### Concerns that meet the 'harm threshold'

- A concern or allegation may meet the harm threshold where an adult working in or on behalf of the organisation 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 they may pose a risk of harm to children; or
  - behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.
- Allegations meeting the harm threshold will be managed in accordance with Part Four of KCSIE and local allegations management arrangements.
- The organisation will consider whether a safeguarding referral is required for the child or any other children who may be affected. Appropriate safeguarding action will not be delayed while allegations management arrangements are being considered.
- Where staff believe appropriate safeguarding action is not being taken, they should follow the whistleblowing procedure and/or seek advice from LESAS/LADO.

### Concerns that do not meet the 'harm threshold'

- Concerns about adults working in or on behalf of the organisation that do not meet the harm threshold, sometimes referred to as low-level concerns, will still be shared, recorded and responded to appropriately.
- A low-level concern does not mean that the concern is insignificant. It is any concern, however small, that an adult may have acted in a way that is inconsistent with expected professional standards or the Staff Behaviour Policy/Code of Conduct and does not meet the harm threshold.
- This may include behaviour outside work where it may affect the adult's suitability to work with children.
- Low-level concerns may arise through suspicion, complaint, disclosure, observation, information from a child, parent/carer or adult, or information arising from safeguarding or vetting checks.
- An open and transparent culture will be promoted so that concerns about adults are shared responsibly with the appropriate person and dealt with promptly.
- Staff should feel able to self-refer where they have found themselves in a situation that could be misinterpreted, may appear compromising or where they believe their behaviour may have fallen below expected professional standards.
- Low-level concerns will be reported confidentially in accordance with the relevant procedure.
- The Executive Headteacher/Headteacher/Head of School will be informed of all low-level concerns and will be the ultimate decision-maker regarding the response. Where concerns are initially

## Safeguarding and Child Protection Policy

reported to the DSL or another nominated person, they will be shared with the Executive Headteacher/Headteacher/Head of School promptly.

- Low-level concerns relating to supply teachers, trainee teachers, contractors, agency staff, volunteers or other third parties will be shared with the relevant employer, agency, training provider or organisation as appropriate.
- If there is uncertainty about whether a concern meets the harm threshold, advice will be sought from the LESAS/LADO.
- Low-level concerns will be recorded in writing, including the concern, relevant context, action taken and rationale for decisions. Records will be confidential, securely stored and managed in accordance with data protection and record-retention requirements.
- Records will be reviewed periodically to identify potential patterns of concerning, problematic or inappropriate behaviour.
- Where a pattern is identified, appropriate action will be considered. This may include seeking advice from LESAS/LADO or HR, additional training or supervision, reviewing safeguarding practice, revising policies or following disciplinary procedures.
- Wider cultural, supervision, training or policy issues that may have contributed to the behaviour will also be considered and addressed where necessary.

### Safe Culture and whistleblowing

- A culture of openness, trust and transparency will be maintained. Expected professional behaviours will be reinforced by all adults working in or on behalf of the organisation.
- All concerns about adults working with children will be taken seriously, shared responsibly, recorded and dealt with promptly and appropriately.
- Staff should feel able to raise concerns about poor or unsafe practice, inappropriate behaviour or potential failures in safeguarding arrangements.
- Staff will be made aware of the whistleblowing procedure (Speak Up). Failure to report concerns about the conduct of an adult where this could place a child at risk may constitute a disciplinary matter.
- Staff who do not feel able to raise child protection concerns internally may seek independent advice through the NSPCC Whistleblowing Advice Line.
- The organisation will make referrals to the Disclosure and Barring Service (DBS) where there is a legal duty to do so, including where a person has harmed or poses a risk of harm to a child and the relevant conditions for referral are met.
- Where a DBS referral is required following the removal or resignation of an individual from regulated activity, it will be made as soon as possible in accordance with statutory guidance and, where appropriate, advice from LESAS/LADO and HR.

## Safeguarding and Child Protection Policy

- Following the conclusion of a case involving concerns or allegations about an adult, consideration will be given to lessons learned and whether improvements are required to safeguarding practice, safer working arrangements, training, supervision, policy or organisational culture.

### 26. Security

- All members of staff have a responsibility for maintaining awareness of buildings and site security and for reporting any concerns that may come to light.
- Trust schools will have appropriate arrangements in place to help keep children, staff and visitors safe on the school sites. These arrangements include keeping gates and doors secure, not sharing access codes, wearing identification badges or lanyards where required, signing visitors in and out, supervising contractors where appropriate, and reporting any site security concerns.
- Appropriate checks and supervision will be undertaken in respect of visitors, volunteers and contractors coming into the schools, in accordance with national safeguarding guidance and the school's procedures.
- Visitors will be expected to sign in and out through the school offices and to wear a visitor badge or other appropriate identification whilst on the school sites. Visitors will be escorted or supervised where this is considered necessary based on the nature of their visit and the level of access they require.
- For visitors attending in a professional capacity, such as social workers, Family Help practitioners, health professionals, police officers or other partner-agency professionals, Trust schools will check their identity and purpose for visiting and seek assurance that appropriate safeguarding checks have been undertaken by their employer or relevant agency. Trust schools will not routinely require such professionals to provide evidence of an individual DBS certificate. Where there are concerns about a visitor's identity, professional status, purpose of visit or suitability, these concerns will be clarified with the relevant employer or agency before access is agreed, unless doing so would delay an urgent safeguarding response.
- Visitors such as parents/carers, family members, guest speakers and others attending school events will not normally be required to provide a DBS certificate. Trust schools will use professional judgement to determine whether such visitors need to be escorted or supervised while on site.
- Volunteers will be subject to appropriate safeguarding checks and risk assessment in accordance with their role and the level of contact they have with children. A volunteer for whom the required checks have not been obtained will not be left unsupervised with children or permitted to undertake regulated activity. Trust schools will record the outcome of any relevant volunteer risk assessment.
- Contractors and other workers attending the school sites will be appropriately managed and supervised in accordance with the nature of their work and their level of access to children. Where appropriate, Trust schools will obtain assurance from the contractor or employing organisation that suitable safeguarding checks and arrangements are in place.
- Any individual who is not known or identifiable on the school sites should be politely challenged by staff and asked to clarify their identity and purpose. Children will be encouraged to report any concerns about unknown or unidentified adults to a member of staff.

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- Trust schools will not accept the behaviour of any individual, including parents/carers, visitors, contractors 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 sites.
- Any site security concern that may indicate a safeguarding risk will be reported promptly to the DSL or their deputy and responded to in accordance with the school's child protection and safeguarding procedures.
- All staff should act promptly where they have a safeguarding concern. Site security arrangements must support, rather than delay, an appropriate safeguarding response where a child may be at risk of harm.

### 27. 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 or service providers to run community or extra-curricular activities, Trust schools will ensure that appropriate safeguarding arrangements are in place.
- Where activities are provided under the direct supervision or management of school staff, the school's existing child protection and safeguarding arrangements will apply.
- Where services or activities are provided separately by another organisation using a school premises, the Executive Headteacher/Headteacher/Head of School and Local School Boards will seek written assurance that the organisation has appropriate safeguarding and child protection policies and procedures in place and that relevant safeguarding checks have been undertaken in respect of staff and volunteers.
- Trust schools will ensure that appropriate arrangements are in place for the organisation to liaise with the relevant school on safeguarding matters where necessary.
- Safeguarding requirements will form part of any agreement for the use of school premises, including any lease or hire agreement, and will be a condition of use.
- Failure to comply with safeguarding requirements may result in the agreement being terminated.
- If appropriate safeguarding assurance is not achieved, an application to use school premises will be refused.
- Where a school receives an allegation relating to an incident that occurred while an organisation or individual was using the school premises for activities involving children, Trust schools will follow their safeguarding and child protection procedures and refer the matter to LESAS/LADO where appropriate.

### 28. Opportunities to teach safeguarding

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- VIAT 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 safeguarding issues will be addressed through Relationships Education and Health Education, as appropriate to pupils' age, stage of development and statutory requirements, together with tutorials, pastoral provision, curriculum opportunities and wider safeguarding and preventative education.
- Trust schools recognise the essential role they play in helping children to understand what safe and appropriate behaviour looks like, including in relationships with other children and adults. The 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.
- The curriculum provides opportunities for pupils to develop self-awareness, self-esteem, social and emotional understanding, assertiveness, decision-making and help-seeking skills. This will help pupils develop a range of age-appropriate strategies to support their own safety and the safety of others.
- Trust schools recognise the crucial role they have in providing preventative education. Preventative education is most effective as part of a whole-school approach which prepares pupils for life in modern Britain and promotes a culture of zero tolerance for sexism, racism, misogyny and misandry, homophobia, biphobia, sexual violence, sexual harassment, derogatory behaviour and other forms of physical violence or conflict.
- Trust schools have a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life. These are supported by the Behaviour policies, pastoral arrangements and planned programmes of age and developmentally-appropriate Relationships Education and Health Education and wider safeguarding education. This provision is delivered through planned opportunities and reinforced through the wider curriculum and everyday school life.
- The schools' safeguarding education programmes will be fully inclusive and appropriate to pupils' age and stage of development. Trust schools recognise that a one-size-fits-all approach will not be appropriate for all children and that some pupils may require a more personalised or contextualised approach. This may include children who are victims of, or vulnerable to, abuse, neglect or exploitation; children with SEND; children with a social worker; children who are care experienced; young carers; and children who may be particularly vulnerable to online harm or child-on-child abuse.
- Through the curriculum and wider safeguarding education, pupils will be supported to learn about relevant safeguarding themes in an age- and ability-appropriate way. These may include positive, healthy and respectful relationships; boundaries, consent and kindness; stereotyping, prejudice and equality; body confidence and self-esteem; recognising and reporting concerns about abusive relationships, including coercive and controlling behaviour; sexual harassment, sexual violence and abuse; online harms, including sharing images, nudes and semi-nudes, deepfakes, pornography, misogynistic influencers, online bullying, grooming, exploitation, misinformation and disinformation; and how and where to access help and support.
- Online safety will be addressed through the curriculum and wider safeguarding education. Pupils will be supported to understand content, contact, conduct and commerce risks; the safe and

## Safeguarding and Child Protection Policy

respectful use of technology; privacy and personal information; how to report concerns; and where to obtain help and support.

- School systems will support children to speak to a range of trusted staff. Children will be listened to and heard, and their concerns will be taken seriously and responded to appropriately in accordance with the school's safeguarding and child protection procedures.
- Trust schools recognise the value of external organisations and speakers in enriching safeguarding education.
- External organisations and speakers will be appropriately assessed before being given access to pupils. This may include consideration of the educational value of their input, the age and ability appropriateness of the content, alignment with the school's values and curriculum aims, safeguarding considerations, and any relevant checks or supervision arrangements.
- When using external visitors, speakers or resources, Trust schools will remain responsible for ensuring that safeguarding education is accurate, appropriate, inclusive and delivered in a way that supports children's safety and wellbeing.

## 29. Physical Safety

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

- There may be limited circumstances when it is appropriate for staff to use restrictive interventions, including reasonable force, to safeguard children, staff or others from harm.
- Trust schools will follow the Department for Education guidance Restrictive interventions, including the use of reasonable force, in schools and will ensure that any use of restrictive intervention is lawful, necessary and proportionate.
- 'Restrictive interventions' is an umbrella term referring to actions, whether planned or reactive, that limit a pupil's movement, liberty or freedom. This may include:
  - the use of reasonable force;
  - physical restraint;
  - non-force restrictive practices; and
  - seclusion, where a pupil is prevented from leaving a space for safety reasons.
- Trust Schools are committed to minimising the need for restrictive interventions through positive behaviour support, early intervention and de-escalation strategies.
- Restrictive interventions will only be used where necessary to prevent harm and will never be used as a punishment. Any use of reasonable force will involve no more force than is necessary and will be used for the shortest possible time, taking account of the individual circumstances.
- The decision whether to use reasonable force is a matter for the professional judgement of the staff member concerned, within the context of the law and the circumstances of the individual situation.

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- Particular care will be taken when supporting pupils with SEND or other vulnerabilities, recognising that some pupils may be disproportionately affected. Reasonable adjustments and preventative approaches will be considered where appropriate.
- Significant incidents involving restrictive interventions, including reasonable force, physical restraint or seclusion, will be recorded in writing as soon as practicable. Parents/carers will be informed as soon as practicable, unless doing so would place the child at risk of harm or compromise a safeguarding or criminal investigation.
- Records of significant incidents will be reviewed by school leaders and governors as appropriate to support safeguarding oversight, identify patterns, consider any disproportionate impact and inform staff training, support and policy development.
- Further information about behaviour management, de-escalation, staff training and physical intervention is contained in the schools' behaviour policies and relevant SEND and staff conduct policies.

### Safeguarding in Physical Spaces, Sport and Overnight Arrangements

- Trust schools recognise that safeguarding children includes ensuring that physical spaces, activities and accommodation arrangements are safe, appropriate and protect children's privacy, dignity and wellbeing.
- Trust schools will consider their safeguarding duties alongside their obligations under equality and human rights legislation when making decisions about toilets, changing rooms, showers, sport, physical education, overnight accommodation, educational visits and other physical arrangements.
- Toilets, changing rooms, showers and other intimate or private spaces will be managed in accordance with KCSIE, relevant premises requirements, safeguarding duties and the school's local arrangements. Trust schools will ensure that arrangements protect the safety, comfort, privacy and dignity of all children.
- Where a child requires an alternative arrangement in relation to toilets, changing rooms, showers, sport, overnight accommodation or similar provision, Trust schools will consider this through a careful, recorded and safeguarding-led process. This will take account of the child's needs and wishes, the safety and welfare of other children, relevant legal duties, practical arrangements and applicable guidance.
- Where the request relates to a child who is questioning their gender, Trust schools will follow the relevant provisions of this policy and KCSIE.
- 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 accordance with KCSIE, the Equality Act and relevant school policies.
- Where the schools arrange overnight visits, trips, camps 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.

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- Sleeping arrangements will be planned with regard to safeguarding duties, the Equality Act and any relevant regulations, standards and national minimum standards applicable to the provision.
- Where a child does not wish to share accommodation with another child, Trust schools will consider whether suitable alternative arrangements can be made where possible. Any alternative arrangement must not compromise the safety, comfort, privacy or dignity of any child.
- Any individual decisions or arrangements made under this section will be recorded and reviewed as appropriate. Relevant information will be shared with staff on a need-to-know basis and in accordance with safeguarding, confidentiality and data protection requirements.

### 30. Local Support

- All members of staff in the school are made aware of local support available.

#### Kent Family Help

- Kent Support level guidance: [www.kscmp.org.uk/guidance/kent-support-levels-guidance](http://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

- *Schools/colleges should insert relevant local links/networks – Please note this information may change as the Families First agenda is rolled out. Links to support schools/colleges are: [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
- For local policing support, contact Kent Police via 101 or 999 where there is an immediate risk of harm.

#### Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

- [www.kscmp.org.uk](http://www.kscmp.org.uk)
- 03000 421126 or [kscmp@kent.gov.uk](mailto: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](mailto: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](#).

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- For strategic education safeguarding or online safety advice, or to enquire about LESAS commissioned services/support, please use the [LESAS enquiry form](#).

### 31. Support Organisations and Resources

#### KSCMP

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

#### NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

#### National Organisations

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

#### Support for Staff

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

#### Support for pupils/students

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://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](http://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](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Report Fraud: [www.reportfraud.police.uk](http://www.reportfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)

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### Support for Special Education Needs and Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>
- Kent Autistic Trust: [www.kentautistictrust.org](http://www.kentautistictrust.org)
- AFASIC: [www.afasic.org.uk](http://www.afasic.org.uk)
- National Autistic Society: [www.autism.org.uk](http://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](http://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](http://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](http://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](http://www.wearewithyou.org.uk/services/kent-for-young-people)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

### Domestic Abuse

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

### Exploitation, violence and modern slavery and trafficking

- KSCMP: [www.kscmp.org.uk/guidance/exploitation](http://www.kscmp.org.uk/guidance/exploitation)
- Kent & Medway Violence Reduction Unit: <https://kentandmedwayvru.co.uk/>
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals: [www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit](http://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](http://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation)
- Report modern slavery: [www.modernslavery.gov.uk](http://www.modernslavery.gov.uk)
- Unseen: [www.unseenuk.org](http://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](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)

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- The right to choose - government guidance on forced marriage:  
[www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage](http://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](http://www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education)
- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://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](http://www.lucyfaithfull.org.uk/advice/creating-safer-places/help-and-advice-for-schools)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Diana Award: [www.antibullyingpro.com](http://www.antibullyingpro.com)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- Centre of expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)
- Lucy Faithfull Foundation 'Shore Space': <https://shorespace.org.uk/>

### Online Safety

- NCA-CEOP: [www.ceop.police.uk](http://www.ceop.police.uk) and [www.ceopeducation.co.uk](http://www.ceopeducation.co.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/online-safety](http://www.nspcc.org.uk/online-safety)
- Get Safe Online: [www.getsafeonline.org](http://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](http://www.ncsc.gov.uk)
- Gov.UK: <https://kidsonline-safety.campaign.gov.uk/>
- Molly Rose Foundation: <https://mollyrosefoundation.org>

### Mental Health

- KSCMP: [www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health](http://www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health)
- KSCMP: [Navigate Wellbeing: Mental Health Signposting for Education Settings](#)
- Kooth: [www.kooth.com](http://www.kooth.com)
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): [www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/](http://www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you: [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)

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- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)
- MindEd: <https://mindedforfamilies.org.uk/>

Kent Therapeutic Alliance and Therapeutic Support Service (KTATSS): <https://ktatss.co.uk>



## Safeguarding and Child Protection Policy

### Part Two

#### Valley Invicta Primary School at Aylesford

##### 1. Key Contact Personnel in School

**Designated Safeguarding Lead:** Sara Lednor (Deputy Headteacher)

**Deputy Designated Safeguarding Leads:** Billy Harrington (Headteacher), Alina Barnard (Teacher), Debbie Ellis (Teacher)

**Designated Safeguarding Officer:** Zoe Adams (HLTA and Family Liaison Officer)

**Named Safeguarding Governor(s):** Maria Marchesini

**Named LAC Governor:** David Tottman

##### 2. Context

Valley Invicta Primary School at Aylesford is a mixed gender primary school for pupils aged 4 – 11 years. We have a duty of care which applies to all pupils and members of staff at the school and our aim is to provide a secure environment where all our children are safe and protected from harm. Our experience suggests the key factors which can make a pupil vulnerable may include, but are not limited to, the following:

- Emotional and mental health;
- Neglect;
- Domestic violence;
- Cyber bullying.

The above is not an exhaustive list and each pupil's level of vulnerability can depend on their personal circumstances. We do not assume that a pupil, who may not be regarded as a vulnerable pupil within the school site, does not become vulnerable when off-site. We educate our pupils on all safeguarding matters through our PSHE curriculum and assemblies programme with a focus on positive, healthy relationships. The School Council produces a child friendly Child Protection policy each year, with their peers, to ensure a collaborative policy where children's voices lead the way. At our school, we have a strong inclusive culture and a committed staff team, and we have established systems and routines that have built and reinforced an understanding of safeguarding for all learners.

A programme of rich experiences throughout the year adapt to and reflect the needs of the different cohorts, ensuring all groups are supported to feel and keep themselves safe.

Engagement is extremely strong and parents, carers and governors are well-informed, and involved in building and maintaining our safeguarding culture.

##### 3. Designated Safeguarding Lead (DSL)

The school has appointed a member of the Leadership Team (Sara Lednor - Deputy Headteacher) as the Designated Safeguarding Leads (DSLs). Deputy Designated Safeguarding Leads have also been appointed (Billy Harrington - Headteacher, Alina Barnard – Teacher, Debbie Ellis – Teacher). Additionally, there is a Designated Safeguarding Officer (Zoe Adams – HLTA and Family Liaison Officer).

##### 4. Confidentiality and Information Sharing

Valley Invicta Primary School at Aylesford has an appropriately trained Data Protection Officer as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements.

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**Data Protection Officer:** Judicium Education.

**School Data Protection Lead:** Mr Billy Harrington – Headteacher.



## Safeguarding and Child Protection Policy

### Appendix 1 – Categories of Abuse

Abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be aware that children can be at risk of harm inside and outside the school, inside and outside the home, and online. Children may be abused by adults or other children, including people known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate abuse that takes place offline.

Safeguarding concerns may also be associated with factors outside the school and may occur between children outside the school environment. Staff should therefore be aware of extra-familial harm, where children may be at risk of abuse or exploitation outside their family.

All staff should know the indicators of abuse and neglect and understand the appropriate action to take where a child may be at risk of harm. Any concern should be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay. Where staff are unsure, they should always speak to the DSL.

Technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying and the making or sharing of indecent images.

All staff should read and understand Part One of Keeping Children Safe in Education (KCSIE) and follow the school's safeguarding and child protection procedures.

#### **Abuse**

Abuse is a form of maltreatment of a child. It involves inflicting harm or failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others.

Children may be abused in a family, institutional or community setting by adults or other children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Children may also cause harm to other children or family members. This includes child-on-child abuse and child-to-parent or carer abuse.

#### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration, for example rape or penetration with an object, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse may also involve non-contact activities, including involving children in looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

## Safeguarding and Child Protection Policy

Sexual abuse can take place online, and technology can be used to facilitate abuse that takes place offline. 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. Staff should be aware of the school's policies and procedures for responding to child-on-child sexual abuse, sexual violence and sexual harassment.

### Signs that may indicate Sexual Abuse

Indicators may include:

- Sudden changes in behaviour or school performance.
- Depression, withdrawal or increased anxiety.
- Regression to younger behaviour, for example thumb sucking, playing with discarded toys or acting like a baby.
- Sexualised behaviour or displays of affection that are sexual and age inappropriate.
- Self-harm, self-mutilation or attempts at suicide.
- Alluding to secrets which the child cannot reveal.
- Secrecy relating to technology or online activity.
- Clinginess or a need for constant reassurance.
- Distrust of familiar adults or anxiety about being left with particular people.
- Fear of undressing, for example for PE.
- Unexplained gifts or money.
- Fire setting.
- Sexually transmitted infections or pregnancy.

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

### Physical Abuse

Physical abuse is 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

Indicators may include:

- Bruises or abrasions, particularly around the face, mouth, cheeks or other soft areas of the body.
- Bilateral injuries, such as bruising around both eyes.
- Fingertip bruising, bite marks or other injuries suggesting physical restraint or assault.
- Burns or scalds, particularly where there are unusual patterns or a clear spread of injury.
- Deep contact burns, including cigarette burns.
- Strap marks, welts or other injuries suggesting beatings.
- Injuries that cannot be satisfactorily explained.
- Explanations for injuries that are inadequate, inconsistent, excessively plausible or change over time.
- A delay in seeking medical treatment for an injury.
- Covering the arms or legs even when the weather is hot.

## Safeguarding and Child Protection Policy

- Inappropriate or harmful use of medication.
- Aggressive behaviour or severe temper outbursts.

### Emotional Abuse

Emotional abuse is 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.

Emotional abuse may also involve not giving a 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, overprotection, limitation of exploration and learning, or preventing a child from participating in normal social interaction.

Emotional abuse may involve seeing or hearing the ill-treatment of another. It may include 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

Indicators may include:

- Overreaction to mistakes.
- Lack of self-confidence or self-esteem.
- Excessive need for approval, attention or affection.
- Sudden speech disorders.
- Unwillingness or inability to play.
- Extremes of passivity or aggression.
- Self-harm.
- Eating disorders or significant changes in eating behaviour.
- Fear of parents or carers being contacted.
- Compulsive stealing.
- Drug, alcohol or solvent misuse.
- Secrecy relating to technology or online activity.

### Neglect

Neglect is 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, for example as a result of maternal substance misuse.

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;

## Safeguarding and Child Protection Policy

- ensure adequate supervision, including the use of inadequate caregivers;
- ensure access to appropriate medical care or treatment; or
- respond appropriately to a child's basic emotional needs.

### Signs that may indicate Neglect

Indicators may include:

- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Inadequate clothing.
- Frequent lateness or non-attendance at school.
- Persistent or unexplained absences from education.
- Running away.
- Untreated medical problems.
- Loss of weight or being constantly underweight.
- Poor relationships with peers.
- Low self-esteem or a withdrawn presentation.
- Compulsive stealing or scavenging.
- Rocking, hair twisting or thumb sucking.

### Important Safeguarding Consideration

The categories above are not exhaustive and should not be used as a checklist. A child may experience more than one form of abuse or neglect at the same time, and indicators may have a range of explanations. Staff should consider the child's individual circumstances and the wider context, including risks inside and outside the home, online risks, child-on-child abuse and extra-familial harm.

All staff must act on concerns without delay and follow the school's safeguarding and child protection procedures. Where there is uncertainty about whether a concern should be reported, staff should speak to their DSL or Deputy DSL.

## Safeguarding and Child Protection Policy

### APPENDIX 2 – Keeping Yourself Safe When Responding to Disclosures

(THE 6 R'S- WHAT TO DO IF...)

#### 1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said.

#### 2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- **Do not promise confidentiality**; you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know.

#### 3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she....?" Such questions can invalidate evidence
- **Do** ask open 'TED' questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to.

#### 4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child  
Always ensure that as far as possible you have recorded the actual words used by the child
- Record statements and observable things rather than your interpretations or assumptions.

#### 5. Remember

- Contact the Designated Safeguarding Lead (DSL)
- The DSL may be required to make appropriate records available to other agencies
- KSCB: [www.kscb.org.uk](http://www.kscb.org.uk)

#### 6. Relax

- Get some support for yourself. Dealing with disclosures can be traumatic for professionals.

## Safeguarding and Child Protection Policy

### APPENDIX 3 – Enforced School Closure

During any school closure, with arrangements in place for a virtual school, all schools will adhere to the Safeguarding and Child Protection Policy. Please note the following key arrangements in place during school closures:

- An online platform (MyConcern) is used for staff to report any safeguarding concerns. The DSLs and Deputy DSLs have access to this from home and can respond to any safeguarding concerns as they are raised. Should both members of staff become ill at this time of closure, there is an additional Safeguarding Officer and issues will be overseen by another member of the Leadership Group to ensure appropriate actions have been taken.
- Should parents/carers have any concerns about the safety of their daughter/son during school closure contact can be made with the DSL or Deputy DSL by using the school telephone number or relevant email addresses:
- Staff will continue to look after the wellbeing and safety of our students through virtual school activities, whereby they are following the normal daily timetable, are in regular contact with students and colleagues and will raise any concerns regarding wellbeing and attendance via the appropriate channels.
- Students considered to be particularly vulnerable will be supported with more regular personalised contact from pastoral staff, SENCOs and welfare leads.
- School provision will be put in place for children of Key Worker parents/carers and vulnerable students when appropriate. Staff at the provision will have had safeguarding training and will share any concerns with the DSL or Deputy DSL as necessary.
- All forms of abuse are a priority and any new cases will be dealt with in liaison with the appropriate external agencies by the DSL or Deputy DSL.
- Parents/Carers have been reminded to pay particular attention to their child's online safety at a time of increased use of social media and other online platforms. Security measures are in place across all school software monitoring student use and any concerns will be flagged to the DSL or Deputy DSL for ongoing action as necessary.
- School staff will continue to adhere to 'whistleblowing' procedures should they become concerned about the safety of a colleague working within their school.

## Safeguarding and Child Protection Policy

### APPENDIX 4 – Specific Safeguarding Issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Annex B.

Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. If you wish to cover these in the policy, consider including:

- An explanation of what the issue is and how your school approaches it (e.g. any preventative measures in place, training you provide for staff);
- What staff should be aware of and actions they should take;
- How your school works with external agencies, where relevant.

You should also ensure your policy reflects any locally agreed procedures put in place by the 3 safeguarding partners.

#### Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Are at risk of forced marriage or FGM;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system;
- Cease to attend a school;
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

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### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education ;
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend;
- Suffering from sexually transmitted infections or becoming pregnant.

## Safeguarding and Child Protection Policy

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### Child abduction and community safety incidents

For the purposes of this policy, "child abduction" is defined as 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 and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils. Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

### Cyber-crime

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

### Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

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The DSL will provide support according to the child's needs and update records about their circumstances.

### Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL (and deputy) will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### FGM

For the purposes of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

**NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is

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important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of "‘honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

### Forced marriage

Forcing a person into 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 any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place;

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- Activate the local safeguarding procedures and refer the case to the local authority's designated officer ;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

### Modern slavery

For the purposes of this policy, "modern slavery" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

### Preventing radicalisation

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Terrorism is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system
  - The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves;
- Becoming susceptible to conspiracy theories and feelings of persecution;
- Changes in friendship groups and appearance;
- Rejecting activities they used to enjoy;

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- Converting to a new religion;
- Isolating themselves from family and friends;
- Talking as if from a scripted speech;
- An unwillingness or inability to discuss their views;
- A sudden disrespectful attitude towards others;
- Increased levels of anger;
- Increased secretiveness, especially around internet use;
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- Accessing extremist material online, including on Facebook or Twitter;
- Possessing extremist literature;
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our behaviour policy and online safety policy.

### **Child-on-child abuse (including harassment and violence)**

This is when children abuse other children. This type of abuse can take place inside and outside school and online.

Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, 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 sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child on child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex;
- Through a group of children sexually assaulting or sexually harassing a single child or group of children;
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours;
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

### Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

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- Increased absence from school;
- Change in friendships or relationships with older individuals or groups;
- Significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male;
- Having been frequently absent or permanently excluded from school;
- Having experienced child maltreatment;
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Pupils/students with family members in prison**

Pupils/students with a family member in prison will be offered pastoral support as necessary. They will receive a copy of relevant materials and, where appropriate, will be allowed the opportunity to discuss questions and concerns.

### **Pupils/students required to give evidence in court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support and materials.

### **Mental health**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil/student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – Trust schools will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils/students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils'/students' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

Trust schools will access a range of advice to help them identify pupils/students in need of additional mental health support, including working with external agencies.

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### Kent and Medway Gang Strategy

This strategy is the first multi-agency commitment to tackle gangs operating across Kent and Medway, and to support those affected by gangs and gang-related crime.

Vulnerable children and young people at risk of criminal exploitation by gangs are also at risk of a whole range of aligned abuse as a result of gang affiliation – from emotional and psychological maltreatment to sexual abuse and debt bondage. They may also be in situations which result in the neglect of their basic needs, live in an unsafe environment, have poor attendance and correspondingly poor long-term outcomes.

For full details please see this link:

[https://www.kscb.org.uk/data/assets/pdf\\_file/0005/81455/Final-Version-Kent-and-Medway-Gangs-Strategy.pdf](https://www.kscb.org.uk/data/assets/pdf_file/0005/81455/Final-Version-Kent-and-Medway-Gangs-Strategy.pdf)

### Gangs, County Lines, Serious Violence, Crime and Exploitation

VIAT recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegations seriously and work in ways that support children and keep them safe.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education;
- Change in friendships/relationships with others/groups;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional wellbeing;
- Significant decline in performance;
- Signs of self-harm/significant change in wellbeing;
- Signs of assault/unexplained injuries.

### Upskirting

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

### Checking the identity and suitability of visitors

Adapt this section to reflect procedures in your setting.

- All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit;
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification;
- Visitors are expected to sign the visitors' book and wear a visitor's badge;
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID.
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and

## Safeguarding and Child Protection Policy

will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### Non-collection of children

On occasions when parents or the persons normally authorised to collect the child are not able to collect the child, they provide us with written details of the name, address and telephone number of the person who will be collecting their child. We agree with parents to have a Password system in place to verify the identity of the person who is to collect their child.

Parents are informed that if they are not able to collect the child as planned, they must inform us so that we can begin to take back-up measures. We provide parents with our contact telephone number.

We inform parents that we apply our child protection procedures as set out in our child protection policy in the event that their children are not collected from setting by 4pm and the staff can no longer supervise the child on our premises.

### If a child is not collected at the end of the day, we follow the following procedures:

- Home address and telephone number – if the parents do not have a telephone, an alternative number must be given, perhaps a neighbour or close relative.
- Place of work, address and telephone number (if applicable).
- Mobile telephone number (if applicable).
- Names, addresses, telephone numbers and signatures of adults who are authorised by the parents to collect their child from the setting, for example a childminder or grandparent.
- Who has parental responsibility for the child.
- Information about any person who does not have legal access to the child.
- The child's file is checked for any information about changes to the normal collection routines.
- If no information is available, parents/carers are contacted at home or at work.
- If this is unsuccessful, the adults who are authorised by the parents to collect their child from the setting – and whose telephone numbers are recorded on SIMS – are contacted.
- All reasonable attempts are made to contact the parents or nominated carers.
- The child does not leave the premises with anyone other than those named on the Registration Form or in their file.

### If no-one collects the child by 4pm and there is no-one who can be contacted to collect the child, we apply the procedures for uncollected children:

- We contact our local authority children's social services care team on: 03000 411 111
- The child stays at school in the care of two fully-vetted workers until the child is safely collected either by the parents or by a social care worker.
- Social Care will aim to find the parent or relative if they are unable to do so, the child will become looked after by the local authority.
- Under no circumstances do staff go to look for the parent, nor do they take the child home with them.
- A full written report of the incident is recorded in the child's file on MyConcern.

### Missing pupils

Once a pupil is identified as missing by any member of school staff, the Designated Safeguarding Lead will be informed.

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Staff will use professional judgement and risk assess the urgency of the situation to help inform the timeframe required in establishing the pupils' whereabouts before notifying the Police. Timeliness should be on a case by case basis.

Designated Safeguarding Lead should, together with the class teacher, assess the child's vulnerability.

School staff will try to locate the pupil and try to establish the whereabouts of them. School staff will contact home and try to contact the pupil via their mobile telephone if known.

### Notifying the Police

The information required by the Police to assist in locating and returning the pupil to a safe environment is as follows:

- The pupils name/s; date of birth; status (for example looked after child); responsible authority;
- Where and when they went missing;
- Previous missing episodes and where they went;
- Who, if anyone, they went missing with;
- What the child was wearing plus any belongings they had with them such as bags, phone etc.; include mobile number.
- Description and recent photo;
- Medical history, if relevant;
- Time and location last seen;
- Circumstances or events around going missing with relevant safeguarding information;
- Details of family, friends and associates
- Contact details of safeguarding lead if it was after school hours.

Whilst the search is ongoing, Trust schools will continue to liaise with the police and act in accordance with police instructions.

Option 1 – if the child returns before the police have arrived then the Police must be informed and own school procedures need to be followed.

Option 2 - if the child returns to school of their own volition, then the Police must be informed and own school procedures need to be followed.

Option 3 - if the police locate the child and bring them back to the school the Police will conduct the safe and well interview and Trust schools will follow School procedure.

Where a pupil has a known risk of being missing, a risk assessment for the pupil will be written and put in to place

This will be logged on MyConcern and VIPS School Improvement Director informed.

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### APPENDIX 5: Safer Recruitment and DBS Checks – Policy and Procedures

#### Recruitment and selection process

To make suitable people are recruited, the Trust and its schools will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children;
- That safeguarding checks will be undertaken;
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children;
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

#### Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity);
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

#### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them;
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history;
  - Whether they are included on the barred list;
  - Whether they are prohibited from teaching;
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales;
  - Any relevant overseas information.
- Sign a declaration confirming the information they have provided is true.

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### Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references;
- Liaise directly with referees and verify any information contained within references with the referees;
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher as accurate in respect to disciplinary investigations;
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate;
- Resolve any concerns before any appointment is confirmed.

### Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this;
- Explore any potential areas of concern to determine the candidate's suitability to work with children;
- Record all information considered and decisions made.

### Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity;
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken;
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;
- Verify their mental and physical fitness to carry out their work responsibilities;

## Safeguarding and Child Protection Policy

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- Verify their professional qualifications, as appropriate;
- Ensure they are not subject to a prohibition order if they are employed to be a teacher;
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid work, or volunteering, in a school or college where the activity is regulated activity because it is carried out frequently by the same person or the period condition is met; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

### Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more;
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
  - We believe the individual has engaged in [relevant conduct](#); or
  - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
  - We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
  - The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

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### Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the Trust schools have had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity;
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Schools with pupils aged under 8 add: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### Volunteers

We will:

- Allow a volunteer who has not had the required safeguarding checks to work in regulated activity;
- Obtain an enhanced DBS check with children's barred list information for all volunteers who are engaging in regulated activity, including volunteers who teach, train, instruct, care for or supervise children on more than three days in any 30-day period or overnight.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment;
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we

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will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### Trustees, Governors and Members

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008);
- Identity;
- Right to work in the UK;
- Other checks deemed necessary if they have lived or worked outside the UK.

### Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

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### APPENDIX 6: Allegations of Abuse made against Staff

#### 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, including a 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 may 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.

The Trust and its schools will deal with any allegation 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 lead any investigation. This will be the Executive Headteacher/Headteacher/Head of School, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

#### 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 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 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 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 or other work for the Trust.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, 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;

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- **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.

### Procedure 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 designated officer at the local authority. 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 designated officer – 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 designated officer as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (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 such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with 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 designated officer, police and/or children's social care services, 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**, agree and record the rationale for this with the designated officer. 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 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 designated officer 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 designated officer to initiate the appropriate action in school 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.

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- Inform the parents or 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 the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;
- Keep the parents or carers of the child/children involved informed of the progress of the case (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.

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 school is made aware that the secretary of state 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 Trust schools 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 school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member 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 governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation;
- We will involve the agency fully, but Trust schools 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:

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- 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 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 ceases to use their services, or the individual resigns or otherwise ceases to provide their services, Trust schools 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, Trust schools will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### 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 children's social care may be appropriate;
- Shown to be deliberately invented, or malicious, Trust schools 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, Trust schools will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### Confidentiality and information sharing

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

The case manager will take 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 or 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 malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be 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, decisions reached and the outcome;
- A declaration on whether the information will be referred to in any future reference.

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

### References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated 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 circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school'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

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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

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;
- 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;
- Using inappropriate sexualised, intimidating or offensive language.

### Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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;
- 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

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If the concern is raised via a third party, the headteacher 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 Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

### Record keeping

All low-level concerns will be recorded in writing. 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 harms 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.

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### Document Management

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| Review Period/Frequency: |  |

### Revision History

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| Description of Revision: |     |
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| Colleague Responsible:   |     |
| Date of Revision:        |     |
| Approval Body:           | TEG |
| Date Approved:           |     |

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