



Child Protection and Safeguarding: **September 2026**

based on 'Keeping Children Safe in Education' DfE guidance, September 2025



Approved by: Board of Trustees	Date: September 2026
Last reviewed on: 1st September 2026	Next review due by: 1st September 2027

Important contacts

Role	Name	Contact Details
CEO	Kelly Brown	<i>The CEO may be contacted by email should none of the other DSLs be contactable; and must be consulted if a serious safeguarding concern arises</i> ceo@whinlessdowntrust.co.uk
Designated Safeguarding Lead (DSL)	Casey Hall Lisa Sprigmore Helen Thompson	chall@whinlessdowntrust.co.uk lsprigmore@vale-view.kent.sch.uk hthompson@stmartins.kent.sch.uk
Deputy DSL	Shara Wheeler Alex Wheeler Beth Creed Jacky Cador	sharaw@prioryfields.kent.sch.uk alexh@prioryfields.kent.sch.uk bcreed@vale-view.kent.sch.uk JCador@stmartins.kent.sch.uk
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Integrated Front Door <i>Child at risk of immediate harm</i>		03000411111 (Outside office hours – 03000419191) or call 999 if a child is at risk of immediate harm Frontdoor@kent.gov.uk https://childrens.kent.gov.uk/web/portal
LADO Education Safeguarding Advisory Service (LESAS) Local Authority Designated officer (LADO)		<u>LESAS Enquiry Form</u> Use LESAS form for all enquiries Referral to LADO now through Front Door Service (above)
Chair of Trust	Alison Macintosh	Contact via clerk / PA 01304200350
Safeguarding Trustee	Pam Brivio	Contact via clerk / PA 01304200350
Safeguarding Local Governors	Malcolm Bowler Chris Scoble	Contact via Governance Professional: 01304 211543

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What to do if you have a welfare concern in Whinless Down

Why are you concerned?

For example

- Something a child has said – e.g., Allegation of harm
- Child's appearance – may include unexplained marks, emotional presentation as well as dress

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

Follow the school procedure (using CPOMS to report, informing a DSL that a log has been made – using a green form if no access to CPOMS)

- Reassure the child
- Clarify concerns, using open questions if necessary (**T**ED: **T**ell, **E**xplain, **D**escribe)
- Record facts and not opinions and use child's own words. Sign and date your record

Inform the Designated Safeguarding Lead

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with Area Education Safeguarding Advisor (03000 423169) or Local Authority Social Worker at the Front Door.

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Learners and Parents:

- Follow school complaints procedures, available on the schools' websites.

Record decision making and action taken in the learner's child protection file - CPOMS

Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance, attendance 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**

1 Child Focused Approach to Safeguarding

1.1 Introduction

- Whinless Down Academy Trust schools (Priory Fields, St Martin's and Vale View) recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, trustees and governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- Whinless Down Academy Trust schools believe 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 to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Staff working with children at Whinless Down Academy Trust schools will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- Whinless Down Academy Trust recognises the importance of providing an ethos and environment within schools that will help children to be safe and to feel safe. In our schools, children are respected and are 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 services to provide.
- Our core safeguarding principles are:

Prevention

- Positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

Protection

- Following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.

Support

- For all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

Working with parents and other agencies

- To ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2026.

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE, 2026), which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:
 - Keeping Children Safe in Education (KCSIE)
 - 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
 - *Kent and Medway Safeguarding Children Procedures*
 - The Education Act 2002
 - Education and Inspections Act 2006
 - The Education (Independent School Standards) Regulations 2014
 - The Non-Maintained Special Schools (England) Regulations 2015
 - The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 (as amended) requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

- The Whinless Down Academy Trust will continue to closely follow government guidance in response to coronavirus (Covid-19) and although our safeguarding principles currently remain the same we will make amendments to this policy and our approaches if advised to do so.
- As a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will continue to work with local services, such as health and the local authority, to ensure necessary support remains in place.

1.3 Definition of Safeguarding

- In line with KCSIE 2026 and WTSC 2026, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - o Providing help and support to meet the needs of children as soon as problems emerge
 - o Protecting children from maltreatment, whether that is within or outside the home, including online
 - o Preventing the impairment of children's mental and physical health or development
 - o Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - o Taking action to enable all children to have the best outcomes
- The Whinless Down Academy Trust acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - o Abuse and neglect
 - o Bullying, including cyberbullying
 - o Children with family members in prison
 - o Children Missing Education (CME)
 - o Child missing from home or care
 - o Child Sexual Exploitation (CSE)
 - o Child Criminal Exploitation (CCE)
 - o Contextual safeguarding (risks outside the family home and relevant to our local context such as the high incidence of poor parental mental health, high incidence of domestic violence and the increased risks posed by county lines)
 - o County lines and gangs
 - o Domestic abuse
 - o Drugs and alcohol misuse
 - o Fabricated or induced illness
 - o Faith abuse
 - o Gender based abuse and violence against women and girls
 - o Hate
 - o Homelessness
 - o Human trafficking and modern slavery
 - o Mental health
 - o Making or sharing of nudes and semi-nudes, including where images are digitally altered or generated using artificial intelligence

- o Online safety
- o Child-on-child abuse
- o Preventing radicalisation and extremism
- o Private fostering
- o Relationship abuse
- o Serious violence
- o Sexual violence and sexual harassment
- o So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- o Up skirting

(Also see Part One and Annex A (Further information) within 'Keeping Children Safe in Education' 2026)

1.4 Related Safeguarding Policies

- This policy is one of a series in the Whinless Down Academy Trust integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - o Behaviour management linked to the use of physical intervention and searching screening and confiscation
 - o Code of conduct
 - o Behaviour policy
 - o Online safety, Social media and Mobile and smart technology
 - o Anti-bullying
 - o Data protection and information sharing
 - o Image use
 - o Relationship and Sex Education (RSE)
 - o Personal and intimate care
 - o Health and safety, including plans for schools reopening
 - o Attendance
 - o Risk assessments (e.g. school trips, use of technology, schools re-opening)
 - o First aid and accidents
 - o Managing allegations against staff
 - o Staff code of conduct, including Acceptable Use of Technology Policies (AUP)
 - o Safer recruitment
 - o Whistleblowing

Supporting Guidance (to be read and followed alongside this document)

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

1.5 Policy Compliance, Monitoring and Review

- The Whinless Down Academy Trust will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2026. All staff are expected to read Part One in full; the shorter condensed version previously contained in Annex A has been removed in KCSIE 2026.
- Parents/carers can obtain a copy of the Whinless Down Academy Trust Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the schools' websites.
- The policy forms part of our schools' development plans and will be reviewed annually by the trustees /leadership who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead (DSL) and headteachers will ensure regular reporting on safeguarding activity and systems to the trustees/leadership. The governing body/leadership will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2 Key Responsibilities

2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The governing body have regard to the KCSIE 2026 guidance and will ensure our policies, procedures and training is effective and always complies with the law.
- The governing body will ensure that all governors receive safeguarding and child protection (including online) training at induction, equipping them with the knowledge to provide strategic challenge to ensure that policies and procedures deliver a robust whole school approach to safeguarding, and that it is regularly updated.

- The Whinless Down Academy Trust has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring 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 governing body and leadership team will ensure that the DSL is 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.
- The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect) are understood, and followed by all staff.

2.2 Designated Safeguarding Lead (DSL)

- The Whinless Down Academy Trust has appointed the Headteachers at each school to act as the Designated Safeguarding Leads (DSLs).
 - Casey Hall, Priory Fields
 - Lisa Sprigmore, Vale View
 - Helen Thompson, St Martin's
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and filtering and monitoring). Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The Whinless Down Academy Trust has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence to ensure that a DSL is always available to discuss concerns.
 - Shara Wheeler, AHT, Priory Fields
 - Sam Kelly, SENCo, Vale View
 - Jacky Cadour, AHT / SENCo, St Martin's
- It is the role of the DSL to carry out their functions as identified in Annex B of KCSIE 2026. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns
 - Taking lead responsibility for filtering and monitoring of IT systems
 - Maintaining a confidential recording system for safeguarding and child protection concerns
 - Coordinating safeguarding action for individual children

- When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
 - Liaising with other agencies and professionals such as local authority children's social care, in line with KCSIE 2026 and WTSC 2026
 - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
 - Representing, or ensure the schools are appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
 - Managing and monitoring the school's role in any multi-agency plan for a child.
 - Being available during term time (during school hours) for staff in the schools to discuss any safeguarding concerns.
 - Helping promote educational outcomes by sharing the 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.
 - Ensuring adequate and appropriate DSL cover arrangements for periods when the DSL is unavailable, including illness, leave, closures and out-of-hours/out-of-term activities. A clear, reliable and known arrangement will be in place so that safeguarding concerns can be raised, received, monitored and acted upon without delay; this may include a confidential shared mailbox or equivalent system.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Informing the headteacher of any significant safeguarding issues.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3 Members of Staff

Our staff play a particularly important role in safeguarding as they are in a position to observe 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:
 - Provide a safe environment in which children can learn.
 - Be aware of issues that can put children at additional risk of harm, including modern slavery and trafficking, drug and alcohol misuse, missing education, serious violence, criminal and sexual exploitation,

radicalisation, and the making or sharing of nudes or semi-nudes, including where images are digitally altered or generated using artificial intelligence.

- Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection, ensuring that information is shared in a timely manner which may be critical in keeping children safe.
- Know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact this can have upon a child.
- Be able to identify and act upon indicators that children are, or are at risk of developing mental health issues.
- be prepared to identify children who may benefit from universal services and community-based early help, or the targeted early help level of Family Help, and understand the local processes and their role in them.
- Understand the school safeguarding policies and systems including how to respond to child-on-child abuse.
- Understand the staff code of conduct which, amongst other things includes how to respond to low-level concerns, allegations against staff and whistleblowing.
- Understand the role of the DSL and identify the DSLs in their schools
- Undertake regular and appropriate training and regular updates.
- Be aware of the local process of making referrals to local authority children's social care and statutory assessment under the Children Act 1989.
- Know how to maintain an appropriate level of confidentiality.
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- Understand that some children may not feel ready or know how to disclose abuse so prioritise building trusting relationships with children to facilitate communication and have professional curiosity.

2.4 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.
 - Confidently report abuse, neglect or exploitation, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - Contribute to the development of school safeguarding policies.
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe, including online.

2.5 Parents and Carers

- Parents/carers have a responsibility to:
 - Understand and adhere the relevant school policies and procedures.

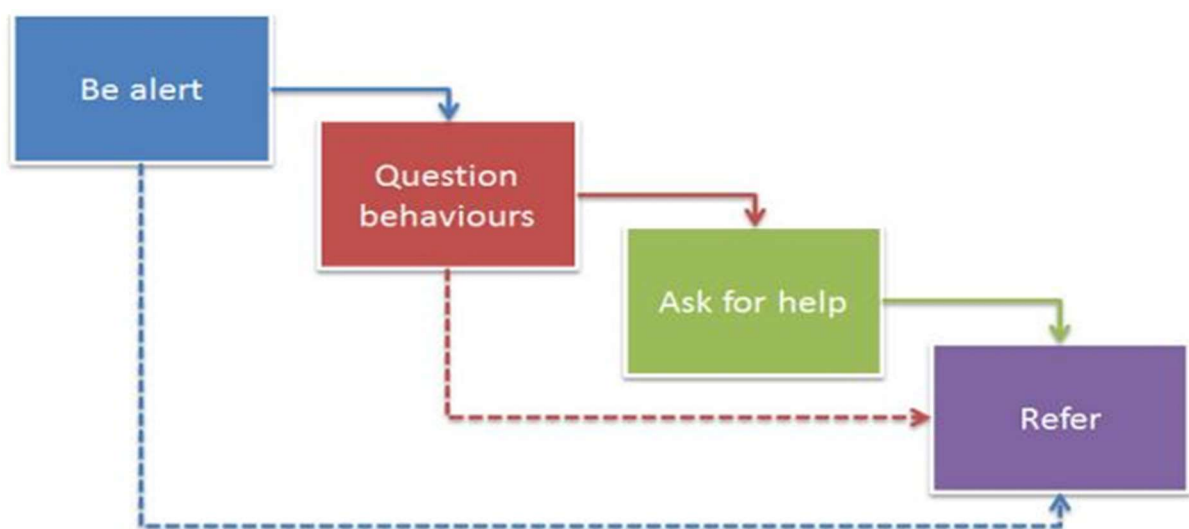
- Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from the school or other agencies.

3 Child Protection Procedures

3.1 Recognising Indicators of Abuse, Neglect and Exploitation

- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children (2026) and Keeping Children Safe in Education 2026, understanding that children can be at risk inside and outside of the school, home and online. This is outlined locally within the [Kent Support Levels Guidance](#).
- The Whinless Down Academy Trust recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
 - For further information see Appendix 1.
- The Whinless Down Academy Trust recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- The Whinless Down Academy Trust recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate child abuse, neglect and exploitation so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse, neglect or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be susceptible to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- The Whinless Down Academy Trust recognises technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- 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 DSL (or deputy).
- The Whinless Down Academy Trust recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- If deemed necessary by the headteacher or by staff authorised by the headteacher following a concern about a child’s safety or welfare, the searching and screening of children and confiscation of any items, including electronic

devices, will be managed in line with the school behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

3.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to the concern and be non-judgmental.
 - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern in line with school record keeping requirements.
 - inform the DSL (or deputy), as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available including the Executive Headteacher, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- The Whinless Down Academy Trust will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of [Integrated Children's Services](#) (ICS) and are accessed via the 'Front Door Service'/[Kent Children's Services Portal](#).
- 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
 - If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
 - Where Intensive Support Early Help (provided by ICS, outlined in the [KSCMP support levels guidance](#)) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the [Kent Children's Services Portal](#).
 - Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.

- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), intensive or specialist support is required and a 'request for support' will be made immediately to Kent *Integrated Children's Services* (via the *portal*) and/or the police, in line with the *Kent Support Level Guidance and KSCMP procedures*.
 - The Whinless Down Academy Trust recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from a social worker via the Front Door Service before deciding next steps.
- The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals. However, all staff are made aware of the local process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy). If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.
 - Staff will speak to a member of the senior leadership team, request a consultation with a social worker from the Front Door Service, or make a request for support to the Front Door Service themselves.
 - In these circumstances, any action taken by staff will be shared with a DSL as soon as is possible.
- In the event of a request for support to the Front Door Service being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will always be informed in the case of a request for support being submitted by the school, unless there is a valid reason not to do so, for example, if informing them may put a child at risk of harm or could undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the *Kent Escalation and Professional Challenge Policy* to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

- DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.
- The Whinless Down Academy Trust schools are [Operation Encompass Schools](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

3.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system (CPOMS) and the DSL informed without delay.
 - An online body map will be completed if injuries have been observed.
 - If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
 - Should CPOMS not be available/accessible, staff should revert to the “Green Form” system, record the concern on an Incident/Welfare form and pass immediately to a DSL.
- Incident/Welfare concern forms are kept: Priory Fields – top corridor outside staffroom, inclusion room, Headteacher’s office. St Martin’s – main office, staffroom, outside AHT office. Vale View – staffroom. They are also available as an appendix to the staff handbooks.
- Records will be completed as soon as possible after the incident/event, using the child’s words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
 - Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child

protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files, the DSL will ensure key staff such as the special educational needs co-ordinators (SENCOs)/ named person with oversight for SEND, will be made aware of relevant information as required.

3.4 Multi-Agency Working

- The Whinless Down Academy Trust recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- The Whinless Down Academy Trust recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

3.5 Confidentiality and Information Sharing

- The Whinless Down Academy Trust recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity in accordance with KCSIE 2026, Working Together to Safeguard Children 2026 and local safeguarding arrangements.
- Where reasonably possible, the schools hold more than one emergency contact number for each pupil. 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.

- The Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 ('data protection laws') place duties on schools and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. These laws do not prevent the sharing of information for the purposes 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.
- KCSIE, the *Information Commissioner's Office* (ICO), DfE *Data Protection in schools guidance* and DfE '*Information sharing advice for safeguarding practitioners*' guidance provides further details regarding information sharing principles and expectations. This document may be accessed in the upper corridor outside staffroom (Priory Fields), Staff Rooms (Vale View and St Martin's).
- All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
- The Whinless Down Academy Trust has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our schools are compliant with all matters relating to confidentiality and information sharing requirements. The current DPO is Michelle Noden (dataofficer@prioryfields.kent.sch.uk)
- The headteacher and DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

3.6 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found in the upper corridor outside staffroom (Priory Fields), Staff Room (St Martin's), Headteacher Office (Vale View).
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the

NSPCC 'Report Abuse in Education' helpline on [0800 136 663](tel:0800136663) or via email: help@nspcc.org.uk

- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
- Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at the Whinless Down Academy Trust will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
- Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- The Whinless Down Academy Trust 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 relevant staff will use Annex A (Further information) of KCSIE 2026, which contains additional information about specific forms of abuse and safeguarding issues. The DSL will ensure staff have access to the relevant sections and understand the implications for practice.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child Abuse

- All members of staff at the Whinless Down Academy Trust recognise that children can abuse other children; this is known as child-on-child abuse and can happen both inside and outside of school and online.
- All members of staff at the Whinless Down Academy Trust are aware of the Trust's policies and procedures with regards to child-on-child abuse and the important role that they have to play in preventing it and responding where they believe a child may be at risk.
- The Whinless Down Academy Trust recognises that child-on-child abuse (including harassment and violence) can take many forms, including but not limited to:

- o Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - o abuse in intimate personal relationships between peers
 - o physical abuse which can include 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)
 - o 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)
 - o sexual harassment such as sexual comments, jokes, remarks and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
 - o making or sharing of nudes and semi-nudes, including where images are consensually or non-consensually shared; this may include images that are digitally altered or generated using artificial intelligence
 - o 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
 - o upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - o initiation/hazing type violence and rituals
- All staff at the Whinless Down Academy Trust recognise 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” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
 - The Whinless Down Academy Trust recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place.
 - All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
 - Concerns about learner's behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies. Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to sanction pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.

- To minimise the risk of child-on-child abuse, The Whinless Down Academy Trust will implement a robust anti-bullying policy, provide age/ability appropriate PSHE and RSE curriculum, whilst also providing a range of reporting mechanisms for the children (e.g. worry boxes).
- The Whinless Down Academy Trust want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by child-on-child abuse will be supported by:
 - taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies e.g. the school anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

4.2 Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child-on-child sexual violence or harassment the Whinless Down Academy Trust will follow the guidance outlined in Part five of KCSIE and the DfE '[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)' guidance.
- The Whinless Down Academy Trust recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' We recognise 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 is never acceptable and the Whinless Down Academy Trust has a zero tolerance approach.
- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, 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 ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- The Whinless Down Academy Trust recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- The Whinless Down Academy Trust recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children

may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support, for example [KSCMP](#) procedures.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, all other children and staff and any actions that are required to protect them.
- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
 - Reports will initially be managed internally by the DSL and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) via the Children's Portal and/or the police. Important considerations which may influence this decision include:
 - the wishes of the victim in terms of how they want to proceed.
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
 - the ages of the children involved.
 - the developmental stages of the children involved.
 - any power imbalance between the children.
 - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
 - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - understanding intra familial harms and any necessary support for siblings following incidents.
 - whether there are any ongoing risks to the victim, other children, or school staff.
 - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent will put a child at additional risk. Any information shared with parents will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- If at any stage the DSL is unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

4.3 Nude and/or Semi-Nude Image Sharing by Children

- The Whinless Down Academy Trust recognises that the making or sharing of nudes and semi-nudes by children is a safeguarding issue. All incidents, whether consensual or non-consensual, require a safeguarding response and will be reported to and dealt with by the DSL (or deputy). The term 'nudes and semi-nudes' is used in line with KCSIE 2026.
- When made aware of concerns involving the making or sharing of nudes and semi-nudes by children, whether consensual or non-consensual, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and the local **KSCMP** guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- a referral will be made to ICS, via the children's portal and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- The Whinless Down Academy Trust recognises that CSE and CCE are forms of abuse. They can be committed or facilitated by an individual or an organised network or gang. Children may identify as part of such a group and may be criminalised for actions taken under coercion. CCE and CSE may involve trafficking and may constitute modern slavery. Where there are concerns about exploitation or modern slavery, staff will speak immediately to the DSL, who will consider the appropriate child protection and modern slavery referral pathways.
- Staff are trained to understand the indicators and the risks for both boys and girls and how these can differ. If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 Domestic Abuse

- Staff are trained to recognise the detrimental and long-term impact that domestic abuse can have on children, affecting their health, wellbeing, development and ability to learn, and understand that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

4.6 Serious Violence

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
 - The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.5 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), child 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 section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).

- Whilst 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.
 - If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

4.6 Preventing radicalisation

- The Whinless Down Academy Trust is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the *specific obligations* placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- The Whinless Down Academy Trust recognises that children are susceptible to extremist ideology and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may need help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the *local procedures* to follow.

4.7 Cybercrime

- The Whinless Down Academy Trust recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the *Cyber Choices* programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

4.8 Preventing radicalisation

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights, or
3. intentionally create a permissive environment for others to achieve their results.

(Government Guidance – New Definition of Extremism, March 2024)

- The Whinless Down Academy Trust recognises that children may be susceptible to radicalisation into terrorism or extremism.
- The Whinless Down Academy Trust is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the *specific obligations* placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- All staff receive appropriate training to enable them to be alert to changes in children’s behaviour which could indicate that they may need help or protection from radicalisation. Training is in line with KCSIE 2026 and the Prevent Duty guidance for schools.
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the *local procedures* in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.
- Through regular updates and training DSLs are aware of the specific threats posed in our local context.

4.9 Cybercrime

- The Whinless Down Academy Trust recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the *Cyber Choices* programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.
- DSLs may also seek advice from Kent Police and/or the Front Door Service

4.10 Domestic abuse

- The Whinless Down Academy Trust recognises 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 (including coercive control), physical, sexual, economic, or emotional abuse.
 - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

- o anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
 - o domestic abuse can take place within different types of relationships, including ex-partners and family members.
 - o there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
 - o domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
 - o domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
 - o it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
 - The schools in the Whinless Down Academy Trust are [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
 - o Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
 - o Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child's welfare.
 - o Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

4.11 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.

4.12 Bruising in non-mobile children

- Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.
- If our schools are concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the '*Kent and Medway Protocol for the Management of Actual or Suspected Bruising in Infants and Children who are not Independently Mobile*' procedures (2.2.8 of the KSCMP procedures). In summary, these procedures state:
 - If a child appears seriously ill or injured, emergency treatment should be sought through an emergency department (ED) and the Kent ICS should be notified of the concern and the child's location.
 - In all other cases:
 - Staff must inform the DSL immediately and describe and document acCPOMStely on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
 - Any explanation of the history of the injury or comments by the parents/carers will be documented acCPOMStely (verbatim) in the child's record, along with the body map.
 - If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to Kent ICS, who have responsibility for arranging further multi-agency assessments.
 - If there are concerns regarding the immediate safety of the child or staff, the police will be called.
 - If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the Front Door Service.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children should be protected, the Whinless Down Academy Trust acknowledges that some groups of children are potentially at greater risk of harm.

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

- The Whinless Down Academy Trust acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect or exploitation.
- The Whinless Down Academy Trust recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges.

- Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse, neglect and exploitation, such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our schools will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO (Alex Hughes at Priory Fields, Jacky Cador at St Martin's and Megan Godwin at Vale View) to plan support as required.
- Our schools have robust intimate/personal care policies which can be found on the School Bus ([School Documents - TheSchoolBus](#)) which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected.
- Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems.

5.2 Children requiring mental health support

- The Whinless Down Academy Trust has an important role to play in supporting the mental health and wellbeing of our pupils. Mental health needs can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will remain professionally curious and consider the wider safeguarding context rather than assuming that a presentation is solely a mental health issue. We have Pastoral Support Mentors in all of our school and trained Thrive Practitioners who work alongside the other members of our inclusion teams who are led by a trained SENCo
- Where there are concerns regarding possible mental health problems for pupils staff should raise a concern with DSLs and the school SENCo via CPOMS or the school SENCo referral form.
- Age/ability appropriate education is provided to our pupils to help promote positive health, wellbeing, and resilience via our carefully planned PSHE curriculum and whole class Thrive / Nurture approaches.

5.3 Children who are absent from education

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- A robust response to children who are absent from 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.

- The school will hold more than one emergency contact number for each pupil 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 (see section 3.5).
- Where the school have concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#) and DfE: [Working together to improve school attendance - GOV.UK](#) and local policies. Local support is available via the Kent [PRU, Inclusion and Attendance Service \(PIAS\)](#).

5.4 Elective Home Education (EHE)

- 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](#) and local [Kent guidance](#).
- We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

5.5 Children who may benefit from Early Help

- Any child may benefit from universal services and community-based early help, or from the targeted early help level of Family Help. Staff should be particularly alert to the potential need for support for a child who:
 - is disabled or has certain health conditions and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
 - has a mental health need
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - is frequently missing/goes missing from education, home or care,
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
 - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a parent or carer in custody, or is affected by parental offending
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing alcohol and other drugs themselves
 - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - is a privately fostered child.
- Where it is identified a child may need early help, staff and DSLs will respond in line with section 3 of this policy.

5.6 Young carers and children with medical conditions

- The Whinless Down Academy Trust will be alert to the needs of young carers, recognising that caring responsibilities can affect attendance, attainment, behaviour and wellbeing. The school will seek to identify young carers early and ensure that they receive appropriate support, including from relevant external, local authority and health services where required.
- The school recognises that children with medical conditions, including allergies, can face additional safeguarding considerations. An incident involving the management of a medical condition does not, in itself, require a safeguarding referral. A safeguarding referral will be considered where the circumstances indicate that the child may be at increased risk of neglect, abuse or exploitation because of their medical condition, for example where essential medication or relevant medical information is repeatedly not provided and this places the child at risk.
- The school will maintain appropriate arrangements for supporting pupils with medical conditions and allergies and will ensure that safeguarding concerns are considered alongside health and medical needs.

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

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

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

- The Whinless Down Academy Trust recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and a previously looked after child also potentially remains vulnerable.
- The school has appointed a '*designated teacher*' (Alex Hughes at Priory Fields, Jacky Cadour at St Martins and Lisa Sprigmore at Vale View) who works with local authorities, including the *Virtual School Kent (including the virtual school head)*, to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child. The virtual school head also has a non-statutory responsibility to promote the educational achievement of all children in kinship care.
- Where the school believes that a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there

is a duty to recognise these arrangements and inform the Local Authority via the Front Door.

- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.9 Children who are Lesbian, Gay, Bisexual, or Gender Questioning

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, the Whinless Down Academy Trust recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- When a child or their parent raises a request relating to social transition, the school will respond in line with KCSIE 2026 and any relevant statutory or departmental guidance. The school will not initiate action in this area. Staff will take time to understand the child's thoughts and feelings, remain professionally curious about the full range of the child's experiences, and consider potential vulnerabilities including mental health and psychosocial needs, family and peer relationships and discriminatory bullying. Any response will be child-centred, safeguarding-led and consistent with the school's Equality Act duties.
- The Whinless Down Academy Trust recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT education is included within our PSHE Curriculum (*Whinless Down Academy - PSHE* (whinlessdowntrust.co.uk) and reflected in our Relationships and Health Education Policy (schoolbus.co.uk/schooldocuments). Our staff will endeavour to reduce the additional barriers faced and provide a safe space that facilitates a culture where children can speak out or share any concerns.

5.10 School premises, single-sex facilities and sport

- The Trust will ensure that arrangements for toilets, changing accommodation and showers meet the relevant statutory requirements and safeguarding expectations. Schools will not allow children into toilets designated for the opposite biological sex and will provide separate toilets for boys and girls aged 8 and over, subject to the exceptions set out in the relevant regulations and KCSIE 2026.
- Where a child questioning their gender does not wish to use facilities designated for their biological sex, the school will consider whether an alternative facility or alternative arrangements can be provided without compromising the safety, comfort, privacy or dignity of the child or other pupils and without compromising the provision of single-sex facilities.
- For sport and PE, the school will have regard to safeguarding, fairness, safety and the Equality Act 2010. Where sport is appropriately single-sex because of safety or fairness considerations, the school will apply its policy consistently and consider individual requests in line with KCSIE 2026 and relevant statutory duties.

5.11 Children who are privately fostered

- *Private fostering* occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not

a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. 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 Childrens 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.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Whinless Down Academy Trust will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- The Whinless Down Academy Trust will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- The Whinless Down Academy Trust identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, disinformation, misinformation and conspiracy theories. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023).
 - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- The Whinless Down Academy Trust recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.
- The headteacher will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety

practice and incidents, including outcomes, on a regular basis to the wider governing body.

6.1 Policies and Procedures

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.
 - The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, social media and behaviour policies.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The Whinless Down Academy Trust uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
 - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- The Whinless Down Academy Trust recognises that generative artificial intelligence (AI) tools may have many uses which could benefit our school communities. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
 - Staff and pupils will be made aware of the benefits and risks of using AI tools through training and education, including the DfE guidance on Generative artificial intelligence in education and the department's resources on safe and effective use of AI. Staff will consider safeguarding, ethics, data protection, intellectual property, accuracy and bias when using AI.
 - Staff are required to carry out a risk assessment and seek written approval from the senior leadership team prior to any use of AI in school.
 - The Whinless Down Academy Trust will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection.
 - Where the school believes that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the school will respond in line with the UKCIS guidance '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*' and the local KSCMP guidance.
- The Whinless Down Academy Trust recognises the specific risks posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2026, statutory guidance on Mobile phones in schools and the EYFS framework, the Trust will maintain appropriate mobile and smart technology and image-use policies. Schools will be

mobile phone-free environments by default, with any exceptions clearly defined in the relevant school policy.

6.2 Appropriate Filtering and Monitoring

- The Whinless Down Academy Trust will do all we reasonably can to limit children's exposure to online risks through school-provided IT systems and will ensure that appropriate filtering and monitoring systems are in place. Filtering and monitoring requirements also apply to the use of generative AI in education. The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the SLT member responsible for filtering and monitoring, with support from the DSL and IT support. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of the checks will be kept.
 - Filtering is managed by LGfL and is achieved through a Schoolprotect system. This uses an agent on the network to determine staff and pupil users, applying appropriate filtering for staff and children based on their login rights.
 - All users will be informed that Whinless Down Academy systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - Any breaches, such as inappropriate search terms, are reported the following day in an email to the ICT technician.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, The Whinless Down Academy Trust will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- The Whinless Down Academy Trust acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.
 - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
 - Learners' internet use will be supervised by staff according to their age and ability.
 - Learners will be directed to use age appropriate online resources and tools by staff.
 - If learners or staff discover unsuitable sites or material, they are required to: turn off the monitor or screen and report the concern immediately to a member of staff, who will then inform the ICT technician.

6.3 Information Security and Access Management

- The Whinless Down Academy Trust is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our

systems as well as staff and learners. Further information can be found in acceptable use policies and online safety policy.

- The Whinless Down Academy Trust will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Staff Training

- The Whinless Down Academy Trust will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

6.5 Educating Learners

- The Whinless Down Academy Trust will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

6.6 Working with Parents/Carers

- The Whinless Down Academy Trust will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
 - Subscribing to a package of support through the Knowsley City Learning Centres which enables us to provide a monthly parent newsletter for parents, a termly staff briefing, an annual parental controls booklet and a parent online safety assembly. We publish the information on our school website and through existing communication channels (such as school Facebook pages and the weekly newsletters).

6.7 Remote Learning

- The Whinless Down Academy Trust will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems e.g., Microsoft Teams
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. The Whinless Down

Academy Trust will continue to be clear who from the school their child is going to be interacting with online.

- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

7. Staff Engagement and Expectations

7.1 Awareness, Induction and Training

- All members of staff, including those who do not work directly with children, will be provided with a copy of Part One of KCSIE 2026 and will read it in full. School leaders, including the DSL, will read KCSIE in its entirety. The previous condensed version of Part One in Annex A has been removed. All members of staff will confirm that they have read and understood the national guidance shared with them; the Trust will retain an appropriate record of completion.
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will be achieved through staff meetings, e-bulletins and/or email.
- Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies, achieved through inviting experienced and knowledgeable staff input.
- The DSL and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.
- Although the school has a nominated lead for the governing body, all members of the governing body, will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

7.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management, including physical intervention, policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the

needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff code of conduct, Acceptable Use Policies, and Social Media.

7.3 Supervision and Support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2022.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

8. Safer Recruitment and Allegations

8.1 Safer Recruitment and Safeguarding Checks

- The Whinless Down Academy Trust is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
 - The Whinless Down Academy Trust will follow relevant guidance in Keeping Children Safe in Education 2026 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
 - The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance, and has developed its own Safer Recruitment Checklist to ensure that the guidance is followed at all times; this now includes the use of online searches of candidates as part of due diligence processes
 - The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance. The Trust will apply the revised KCSIE 2026 definition of regulated activity, including the removal of the previous supervision exemption. From 1 September 2026, volunteers who undertake teaching, training, instructing or supervising children on more than 3 days in a 30-day period or overnight may be in regulated activity and will be subject to the appropriate safeguarding and

DBS requirements. The school will assess each role against the current statutory criteria before an individual starts regulated activity.

- Where the EYFS framework applies, staff and volunteers will not be permitted to begin working in the setting covered by the EYFS framework until the school has received the required enhanced DBS certificate, including barred list information, where applicable.
- The Whinless Down Academy Trust are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare Disqualification Regulations 2018 and related obligations under Disqualification under the Childcare Act 2006.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
 - The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
 - The school will also maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend; regularly reviewing any alternative provision placements to make sure the placement continues to be safe and meets the child's needs.
 - If safeguarding concerns occur whilst a child attends an alternative provision, the placement should be immediately reviewed by the school and ended if necessary.

8.2 Allegations/concerns raised in relation to teachers, including supply teachers, trainee teachers, other staff, volunteers and contractors

- The School will respond to allegations in line with the [local Kent allegations arrangements](#) and Part Four of KCSIE 2026. In depth information can be found within our 'Managing Allegations against Staff' and staff code of conduct policy.
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where headteachers are unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the [LADO Education Safeguarding Advisory Service](#) enquiry form.

8.2.1 Concerns that meet the 'harm threshold'

- The Whinless Down Academy Trust recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone 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.
- Allegations against staff which meet this threshold will be referred immediately to the headteacher who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the Executive Headteacher of the Whinless Down Academy Trust who will contact the LADO and if the allegations is in regard to the Executive Headteacher it should be reported to the Chair of the Trust who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- The Whinless Down Academy Trust may also need to act in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the school, the headteacher will consider whether consultation or referral to the LADO is required, in accordance with local arrangements, and will use the LADO Enquiry Line where appropriate. Where concerns are about trainee teachers, the school will follow the relevant procedures and consider LADO referral. (<https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.kscmp.org.uk%2Fprocedures%2Flocal-authority-designated-officer-lado&data=04%7C01%7CAlison.Watling%40kent.gov.uk%7Cefd47327a4fa4b3a972708d950d61f12%7C3253a20dc7354bfea8b73e6ab37f5f90%7C0%7C0%7C637629703166084747%7CUnknown%7CTWFPbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQJljojV2luMzliLCJBTiI6IkhWwiLCJXVCi6Mn0%3D%7C1000&sdata=gh4qmYZ5N3khjaixDrEVQntTOJ74wGAIZxO%2FQDEudf0%3D&reserved=0>).
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our code of conduct – this includes what a low-level concern is and the importance of sharing them.
- Low-level concerns which are shared about supply staff and contractors will be notified to their employers.

8.2.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored

and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at The Whinless Down Academy Trust will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The Whinless Down Academy Trust has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#) and/or SPS.

9. Opportunities to teach safeguarding

- The Whinless Down Academy Trust will ensure that children are taught about how to keep themselves and others safe, including online as part of providing our broad and balanced curriculum. This will include covering relevant issues through a planned programme of Relationships Education and Health Education.
- We recognise that school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- The Whinless Down Academy Trust recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Our behaviour policy, rules and values help to create a school culture which prepares children for life in modern Britain supporting a zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence and harassment.
- Building respectful relationships with all children supports them to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

10. Physical Safety

10.1 Use of 'reasonable force'

- There may be limited circumstances when it is appropriate for staff to use reasonable force to safeguard children from harm. 'Reasonable force' means using no more force than is necessary for the least amount of time, with the decision based on the individual circumstances and professional judgement within the law. The school will follow the DfE guidance on Restrictive interventions, including use of reasonable force in schools. Staff should consider additional vulnerabilities for children with SEND, mental health problems or medical conditions and the school's duties under the Equality Act 2010.

10.2 The Use of Premises by Other Organisations for non-school activities

- Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place in order to keep children safe (inspecting these as needed). regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. This applies regardless of whether the children who attend any of these services or activities are children on the school roll. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.
- Whinless Down Academy Trust will follow guidance on Keeping children safe in out-of-school settings 2022. Where there is an allegation relating to an incident when an individual or organisation was using one of our school premises for the purposes of running activities for children, as with any safeguarding allegation, our schools will follow all statutory guidance including informing the LADO.

10.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

11. Local Support

- All members of staff in the Whinless Down Academy Trust are made aware of local support available.

Kent Integrated Children's Services/ Children's Social Work Services

- [Kent Integrated Children's Services Portal](#) – select 'urgent' if there is an immediate risk/concern
- Front Door Service: 03000 411111
- Out of Hours Number: 03000 419191

Local Early Help and Preventative Services and Family Hubs

- [Early Help and Preventative Services - KELSI](#)
- [Early Help contacts - KELSI](#)
- [Kent Family Hubs - Kent County Council](#)

Kent Police

- 101 or 999 if there is an immediate risk of harm

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

- kscmp@kent.gov.uk
- 03000 421126

Adult Safeguarding

- Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

Kent LADO Education Safeguarding Advisory Service (LESAS) – Support for Kent Children's Workforce

- [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#)
- To speak to the LADO regarding an allegation against a member of staff, complete a referral on the [Kent Integrated Children's Services Portal](#).

To raise a LADO, strategic education safeguarding or online safety enquiry, commission a review or enquiry about bespoke training or other safeguarding products, please use the [LESAS enquiry form](#).

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect, and 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.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth

- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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

medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance

- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- DfE Preventing and Tackling Bullying *Preventing and tackling bullying* (publishing.service.gov.uk)

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Substance Misuse

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

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- The Children's Society - *Preventing Child Sexual Exploitation* | *The Children's Society*

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Child-on-child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk , *Home - Shore*
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/online-safety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC) - developed to help schools improve their cyber resilience: www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/
- Public Health England: Every Mind Matters
- DfE Promoting and supporting mental health and wellbeing in schools *Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK* (www.gov.uk)

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offender