



Elmley Dray
School

Safeguarding and Child Protection Policy

This policy is to be read in conjunction with the staff code of conduct.

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

This policy will be reviewed **at least** annually and/or following any updates to national and local guidance and procedures.

Key Contacts

	Name	Contact information
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Director - Safeguarding and DDSL	Hayley Furnell	safeguarding@elmleydrayschool.co.uk hayley.furnell@elmleydrayschool.co.uk
Chair of Governors - Safeguarding Committee Lead	Ian Wyles	ian.wyles@elmleydrayschool.co.uk
Local Authority Designated Officer (LADO)	Kent LADO	03000 41 08 88 kentchildrenslado@kent.gov.uk
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The Flow Chart

Act immediately and record your concerns.

If there is an immediate risk of harm, contact the DSL (or Deputy DSL) without delay. If no DSL is immediately available, do not delay making a referral to Children's Social Care, Adult Social Care or the Police where appropriate, and inform the DSL as soon as possible afterwards.

If a learner is in immediate danger or at risk of significant harm, contact the Police (999) and/or Children's Social Care immediately. Anyone can make a referral.

Follow the school procedure

- Reassure the learner (children and vulnerable adults).
- Clarify only where necessary using open questions (TED – Tell, Explain, Describe).
- Do not investigate or ask leading questions.
- Record the learner's own words wherever possible.
- Record factual observations, not assumptions or opinions.
- Do not promise confidentiality. Explain that the information will only be shared with those who need to know in order to keep the learner safe.
- Maintain professional curiosity where something does not feel right, even if the learner has not made a disclosure.
- Sign and date your records
- Seek support for yourself if required from DSL



Inform the Designated Safeguarding Lead

Via: safeguarding@elmleydrayschool.co.uk



If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Learners, Parents and Carers:

- Follow school complaints procedures (link or information on how to access)

At all stages, the learner's circumstances will be kept under review

The DSL/staff will request further support if required to ensure the **learner's safety is paramount**



Record all concerns, discussions, decisions, actions taken and outcomes on MyConcern (or the school's safeguarding recording system) without delay.

Review and request further support if necessary

Why are you concerned?

For example

- Something a learner has said – for example, an allegation of harm
- Learner's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

What to do if you have a welfare concern in Elmley Dray School

Remember

- Safeguarding is everyone's responsibility.
- Never assume someone else has acted.
- If in doubt, speak to the DSL.
- If you remain concerned, escalate your concerns in line with the school's safeguarding and whistleblowing procedures.

Monitor

Be clear about:

- What you are monitoring. For example behaviour trends, appearance.
- How long you will monitor.
- Where, how and to whom you will feedback and how you will record.
- Monitor only where agreed by the DSL. Monitoring must not delay appropriate safeguarding action or referral.



Designated Safeguarding Lead

- Consider whether the learner or young person is at immediate risk of harm: are they safe to go home?
- Access the Kent Safeguarding Support Level Guidance document and procedures:
<https://www.kscmp.org.uk/guidance/worried-about-a-learner>
- Refer to other agencies as appropriate, for example, Internal or community services, Early Help open access, LADO, Kent Adult Social Care, Police or make a Request for Support via Integrated Children's Services

[Worried about a child - Kent Safeguarding learners Multi-Agency Partnership \(kscmp.org.uk\)](https://www.kscmp.org.uk/guidance/worried-about-a-learner)
https://www.medway.gov.uk/info/200170/learners_and_families/600/concerned_about_a_learner/2

[Report abuse - Kent County Council](#)

[Kent and Medway SAB - Report Abuse](#)

- If unsure, consult with Area Education Safeguarding Advisor or Local Authority Social Worker at the Front Door: www.kscmp.org.uk, or Kent Adult Social Care Flowchart: [Adult safeguarding - Kent County Council](#)

Remember: Anyone can make a referral if they believe a learner is at risk of harm.

1. Child and Vulnerable Adult Focused Approach to Safeguarding

1.1 Introduction

- Elmley Dray School recognises our statutory responsibility to safeguard and promote the welfare of all learners (children and vulnerable adults). Safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility. Everyone who comes into contact with learners and their families has a role to play in safeguarding them and should maintain an attitude of 'it could happen here'.
- Elmley Dray School believes that the best interests of learners always come first. All learners have a right to be heard and to have their wishes and feelings taken into account and all learners regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with learners at Elmley Dray School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- Elmley Dray School recognises the importance of providing an ethos and environment within the organisation that will help learners to be safe and to feel safe. In our school learners are respected and are encouraged to talk openly. We will ensure learner'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 learners, 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.
 - **Collaborating with parents/carers and multi-agencies:** to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
 - **Early identification and intervention:** recognising concerns at the earliest opportunity and responding promptly.
- The procedures contained in this policy apply to all staff, including governors (PAT), temporary or third-party agency staff and volunteers, and are consistent with those outlined

within [Keeping children safe in education \(2026\)](#), [Working Together to Safeguard children \(2023\)](#)

- Any references to the DSL should be taken to mean “the DSL (or Deputy DSLs)”.

1.2 Policy context

- This policy is based on the Department for Education’s (DfE’s) statutory guidance [Keeping children safe in education \(2026\)](#) and [Working Together to Safeguard children \(2023\)](#) We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is based on the following legislation:

- [Keeping children safe in education \(2026\)](#)
- [Working Together to Safeguard learners \(2023\)](#)
- Ofsted [Education inspection framework \(EIF\)](#)
- Framework for the Assessment of Children in Need and their Families 2000
- Kent and Medway Safeguarding learners Procedures
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Care Act 2014](#)
- [Education \(Independent School Standards\) Regulations 2014](#)
- [Education Act 2002](#)
- [Education and Inspections Act 2006](#)
- [The Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [The Education \(Independent School Standards\) Regulations 2014](#)
- [The School Staffing \(England\) Regulations 2009](#)
- [The Children Act 1989](#) (and [2004 amendment](#))
- [Non-Maintained Special Schools Regulations 2015](#)
- [Children and Families Act 2014](#)
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights \(ECHR\)](#)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors (PAT) and Headteacher should carefully consider how they are supporting their learners with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting learners (where we can show it’s proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The

PSED helps us to focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a child under 18
 - [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
 - [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with learners
 - Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to learners
 - [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
 - [Mental Capacity Act 2005](#), which provides the legal framework for acting and making decisions on behalf of individuals who lack the mental capacity to do so themselves.
 - [Deprivation of Liberty Safeguards \(DoLS\)](#): Ensures that people who lack capacity and are deprived of their liberty in a care setting or hospital are protected.
 - [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with learners
 - This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#), however our setting does not provide early years education or care.
- Section 175 of the [Education Act 2002](#) requires school Director bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all learners who are learners at a school, or who are learners under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

1.3 Definition of safeguarding

- In line with KCSIE 2026, safeguarding and promoting the welfare of learners is defined for the purposes of this policy as:
 - providing help and support to meet the needs of learners as soon as problems emerge
 - protecting learners from maltreatment whether that is within or outside the home, including online
 - preventing impairment of learners's mental and physical health or development

- ensuring that learners grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all learners to have the best outcomes
- **Child protection** is part of this definition and refers to activities undertaken to protect specific learners who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- **Abuse** is a form of maltreatment of a learner, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- **Neglect** is a form of abuse and is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Appendix 1 defines neglect in more detail.
- **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where learners share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- **Children** includes everyone under the age of 18. **Learners** refers to all children and vulnerable adults in our care.
- The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Childcare Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
 - The local authority (LA)
 - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - The chief officer of police for a police area in the LA area
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the learner involved feels most comfortable with.
- **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of learners) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

(Also see KCSIE 2026)

1.4 Related safeguarding policies

- This policy is one of a series in Elmley Dray School integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - Preventing extremism and radicalisation

- Behaviour, including behaviour management and use of physical intervention
- Staff Code of Conduct
- Online Safety
- Anti-bullying
- GDPR, Data Protection and Confidentiality
- Image Use
- Relationship, Sex and Health Education (RSHE)
- Personal and Intimate Care
- Health and Safety
- Attendance
- Learning Outside the Classroom Policy
- First Aid and Administration of Medication Policy
- Managing Allegations Against Staff
- Acceptable Use of Technology
- Safer Recruitment
- Whistleblowing

1.5 Policy compliance, monitoring and review

- Elmley Dray School 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, and required to read, a copy of this policy and Part One and Annex B of KCSIE 2026 as appropriate which is available on the website of the organisation. Governors, SLT and safeguarding leads are expected to read KCSIE in its entirety.
- All staff (including temporary staff and volunteers) will undergo annual safeguarding training, including any updates throughout the year. New staff who miss said training at the start of the academic year will undergo training as part of their induction.
- Parents/carers can obtain a copy of the Safeguarding and Children and Vulnerable Adults Protection Policy on the organisation website and other related policies not available on the website on request.
- The policy forms part of our development plan and will be reviewed annually by the CIC Director, in collaboration with the Chair of Governors, who has responsibility for oversight of safeguarding and learner protection systems.
- The Chair of Governors and the Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Director and Governing Board (PAT).

1.6 Equality Statement

Some learners have an increased risk of abuse, both online and offline, and additional barriers can exist for some learners with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise learners's diverse circumstances. We ensure that all learners have the same protection, regardless of any barriers they may face.

We give special consideration to learners who:

- o Have special educational needs and/or disabilities (SEND) or health conditions
- o Are young carers
- o May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- o Have English as an additional language (EAL)
- o Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- o Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- o Are asylum seekers
- o Are at risk due to either their own or a family member's mental health needs
- o Are looked after or previously looked after
- o Are missing or absent from education for prolonged periods and/or repeat occasions
- o Whose parent/carers has expressed an intention to remove them from school to be home educated

2 Key Responsibilities

Safeguarding and learner protection is everyone's responsibility. This policy applies to all staff, volunteers and governors (PAT) in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

Safeguarding is embedded throughout the culture of the school. All staff should maintain an attitude of *'it could happen here'* and act in the best interests of the learner at all times. Early identification, early help and timely intervention are central to our safeguarding practice.

This will be underpinned by our:

- o Behaviour policy
- o Pastoral support system

- o Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - ☐ Healthy and respectful relationships
 - ☐ Boundaries and consent
 - ☐ Stereotyping, prejudice and equality
 - ☐ Body confidence and self-esteem
 - ☐ How to recognise an abusive relationship (including coercive and controlling behaviour)
 - ☐ The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - ☐ What constitutes sexual harassment and sexual violence and why they're always unacceptable

2.1 The Governing Board (PAT) and Leadership

The **governing board (PAT)** will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and learner protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure safeguarding is an integral part of strategic leadership, school improvement, governance and decision-making across the organisation
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead (link PAT) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and learner protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure all staff, including governors, volunteers and regular contractors where appropriate, receive safeguarding and child protection training (including online safety) appropriate to their role, and that safeguarding updates are provided regularly throughout the academic year
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- o Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - o Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
 - o Ensure there is effective oversight of filtering and monitoring systems, including regular review of their effectiveness and any safeguarding incidents identified through monitoring
- Make sure:
 - o The DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
 - o Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - o The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - o Ensure there are clear procedures for managing allegations and low-level concerns relating to adults working in or on behalf of the school, and that all concerns are recorded, reviewed and responded to appropriately.
 - o Ensure staff understand that learners with SEND or certain medical conditions may face additional barriers to recognising abuse, communicating concerns or accessing support, and should not assume that indicators of abuse relate solely to a learner's disability or additional needs.
- Where another body is providing services or activities (regardless of whether or not the learners who attend these services/activities are learners on the school roll):
 - o Seek assurance that the other body has appropriate safeguarding and learner protection policies/procedures in place, and inspect them if needed
 - o Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - o Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of directors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate.
- Governors will receive safeguarding training appropriate to their role and will read and understand Keeping Children Safe in Education to enable them to fulfil their statutory safeguarding responsibilities. The safeguarding link governor and Chair should have a detailed understanding of the statutory guidance.
- This policy has information on how governors are supported to fulfil their role.

The **Headteacher** is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:

- o Are informed of our systems that support safeguarding, including this policy, as part of their induction
- o Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their learner joins the school and via the school website
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Promoting a strong safeguarding culture where concerns are identified, discussed and acted upon promptly and appropriately.
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each learner in the Early Years Foundation Stage (if applicable) is assigned a key person - not applicable in our setting.
- Overseeing the safe use of technology, mobile phones and cameras in the setting

2.2 Designated Safeguarding Lead (DSL)

- The DSL is a member of the senior leadership team. Our DSL is Emily Hollis MBE, Headteacher. The DSL takes lead responsibility for learner protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep learners safe online.
- The DSL (or a Deputy DSL) will always be available during school hours to discuss safeguarding concerns. Appropriate arrangements will be in place for safeguarding advice and decision-making outside normal school hours where required.
- When the DSL is absent, the Deputy DSLs will act as cover, having three DDSLs ensures someone is always available.
- The DSL will be given the time, funding, training, resources and support to:
 - o Provide advice and support to other staff on learner welfare and learner protection matters
 - o Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
 - o Contribute to the assessment of learners
 - o Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
 - o Promote supportive engagement with parents and carers where this is in the learner's best interests and does not place the learner at increased risk of harm

- Have a good understanding of harmful sexual behaviour
- Maintain oversight of safeguarding records, ensuring they are accurate, confidential, securely stored and transferred promptly when learners move to another setting
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction
- Promote professional curiosity and ensure safeguarding decisions are evidence-based, proportionate and centred on the wishes, views and best interests of the learner
- The DSL will also:
 - Liaise with local authority case managers and designated officers for learner protection concerns as appropriate
 - Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
 - Be confident that they know what local specialist support is available to support all learners involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
 - Be aware that learners must have an 'appropriate adult' to support and help them in the case of a police investigation or search
 - The full responsibilities of the DSL and Deputy DSLs are set out in their job description.

2.3 All staff

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for learners, promote learner's welfare and prevent concerns from escalating.
- All staff have a responsibility to provide a safe environment in which learners can learn and to identify learners who may benefit from early help or who are at risk of abuse, neglect or exploitation.
- Staff at Elmley Dray School recognise that learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a learner.
- Staff should never assume that somebody else has taken action. If they remain concerned that appropriate action has not been taken, they must escalate concerns in accordance with the school's safeguarding and whistleblowing procedures.
- Staff at Elmley Dray School will determine how best to build trusted relationships with learners, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies.

All staff will:

- o Read (at least) Part One (or Annex A where appropriate) and Annex B of Keeping Children Safe in Education 2026, and confirm annually that they have understood the guidance
- o Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- o Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask learners to do online (e.g. sites they need to visit or who they'll be interacting with online)
- o Provide a safe, respectful and inclusive environment in which all learners feel able to report concerns, recognising that learners who are or are perceived to be LGBTQ+ may be more vulnerable to bullying, discrimination or abuse.
- o Act in line with Teachers' Standards 2012 which state that teachers (including Proprietor Director and Headteacher) should safeguard learners' wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff will be aware of:

- o Our systems that support safeguarding, including this learner protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and Deputy DSLs, the behaviour policy, online safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to learners who go missing from education
- o The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- o The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- o What to do if they identify a safeguarding issue or a learner tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- o The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as learner-on-learner abuse, grooming, learner sexual exploitation (CSE), learner criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- o New and emerging safeguarding risks, including online abuse, artificial intelligence (AI)-generated sexual imagery, online grooming, criminal exploitation, radicalisation, financial exploitation and the misuse of technology

- o The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- o The fact that learners can be at risk of harm inside and outside of their home, at school and online
- o The fact that learners who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other learners
- o That a learner and their family may be experiencing multiple needs at the same time
- o What to look for to identify learners who need help or protection
- o The importance of recording safeguarding concerns promptly, accurately and factually, using the school's safeguarding recording system.

2.4 Children and vulnerable adults

- Children and vulnerable adults have a right to:
 - o Feel safe, be listened to, and have their wishes and feelings taken into account.
 - o Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - o Contribute to the development of Elmley Dray School safeguarding policies.
 - o Receive help from a trusted adult.
 - o Learn how to keep themselves safe, including online.

Learners will be supported to understand how to recognise abuse, stay safe online, develop healthy relationships, understand consent, know how to seek help and understand that safeguarding is everyone's responsibility. Their wishes, views and feelings will be sought, listened to and taken into account when decisions are made about their safety, where appropriate.

Mental Capacity and Decision Making

For learners aged 16 and over, the school will ensure that consideration of the Mental Capacity Act (MCA) 2005 is an integral part of safeguarding and decision-making processes. We will always start from the presumption that a learner has the capacity to make their own decisions unless proven otherwise. Where a learner is deemed to lack capacity for a specific decision, any action taken will be in their 'best interests', involving the learner and their advocates as far as possible.

For learners aged 18 and over, where safeguarding measures may result in a restriction of movement or liberty to keep them safe, the school will demonstrate that Deprivation of Liberty Safeguards (DoLS) have been considered and, where applicable, the appropriate local authority authorizations are sought.

2.5 Parents and carers

- Parents/carers have a responsibility to:

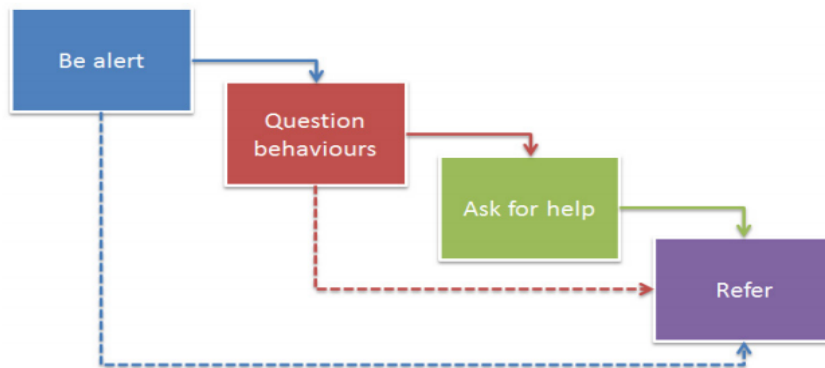
- Understand and adhere to the relevant Elmley Dray School policies and procedures.
- Talk to their learners about safeguarding issues and support Elmley Dray School in their safeguarding approaches.
- Identify behaviours which could indicate that their learner is at risk of harm including online.
- Seek help and support from Elmley Dray School or other agencies.
- Work in partnership with the school to promote the welfare of learners, recognising that safeguarding is most effective when schools, families and partner agencies work together.

3 Recognising Abuse and Taking Action

3.1 Recognising indicators of abuse and neglect

- All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a learner who:
 - may be experiencing abuse, neglect, exploitation or extra-familial harm, or who may benefit from early help to prevent concerns escalating.
 - Is disabled
 - Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
 - Is a young carer
 - Is bereaved
 - Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
 - Is frequently missing/goes missing from education, care or home
 - Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - Is at risk of being radicalised or exploited
 - Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
 - Has experienced online abuse, including online grooming, coercion, cyberbullying or the creation or sharing of AI-generated sexual images
 - Is in a family circumstance presenting challenges for the learner, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - Is misusing drugs or alcohol
 - Is suffering from mental ill health
 - Has experienced trauma or adverse childhood experiences (ACEs)
 - Has returned home to their family from care

- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered learner
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Has unexplained absences or whose attendance has significantly deteriorated
- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please also see Figure 1 for details of the process.
- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner.
- Staff will also maintain an attitude of professional curiosity and recognise that abuse, neglect and exploitation rarely occur in isolation. Staff should be alert to multiple and overlapping vulnerabilities
- All staff receive regular safeguarding training and updates to ensure they understand the definitions and indicators of abuse, neglect, exploitation and extra-familial harm as identified within Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2026).
- Elmley Dray School recognise that when assessing whether a learner may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- 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 learner and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a learner:



[‘What to do if you are worried a learner is being abused’ 2015](#)

- Elmley Dray School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of learner abuse and neglect can vary from learner to learner. learners develop and mature at different rates, so what appears to be worrying behaviour for a younger learner might be normal for an older learner. It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused; however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Elmley Dray School recognises abuse, neglect, and 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 learner abuse or neglect, so staff will be alert to parent-learner 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.
- Learners may report abuse happening to themselves, their peers or their family members. All reports made by learners 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 Elmley Dray School. Learners can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms. This includes online harms, child criminal exploitation (CCE), child sexual exploitation (CSE), serious violence, county lines, harmful sexual behaviour and exploitation facilitated through technology.
- Technology is recognised as a significant safeguarding factor. Abuse may occur online, offline or simultaneously across both environments. Staff will be alert to risks associated with social media, messaging platforms, gaming, livestreaming, artificial intelligence (AI) and emerging technologies.

- Elmley Dray School recognises that it works with learners who have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a learner's safety or welfare, the searching and screening of learners and confiscation of any items, including any electronic devices, will be managed in line with the DfE '[Searching, screening and confiscation at school](#)' guidance.
- The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a learner was in possession of a prohibited item. The DSL (or deputy) will then consider the circumstances of the learner who has been searched to assess the incident against any potential wider safeguarding concerns.
 - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.
 - Searching learners or their possessions must always be proportionate, lawful and carried out with due regard to safeguarding, dignity and privacy.

3.2 If a learner is suffering or likely to suffer harm, or in immediate danger

- Make a referral to local authority social care and/or the police immediately if you believe a learner is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.
- Tell the DSL as soon as possible if you make a referral directly.
- Kent and Medway safeguarding procedures can be found here - [Safeguarding Procedures Manual](#)
- Referrals can be made via:
 - phone [03000 41 11 11](tel:03000411111) (child)/ [03000 41 61 61](tel:03000416161) (adult)
 - email social.services@kent.gov.uk
 - [text relay](#) 18001 03000 41 11 11/18001 03000 41 61 61
 - Out of hours emergency [03000 41 91 91](tel:03000419191)
- Anyone can make a referral to Children's Social Care where they believe a learner is at risk of harm. Staff should never delay a referral because they cannot contact the DSL.
- The following link provides information for reporting child abuse to your local council: <https://www.gov.uk/report-learner-abuse-to-local-council>

3.3 If a learner makes a disclosure to you and/or if you have concerns about a learner

- If staff are made aware of a safeguarding and learner protection concern, they are expected to:
 - listen carefully to the learner, reflecting back the concern.

- Record the learner's own words wherever possible and avoid interpreting or paraphrasing what has been said.
 - be non-judgmental.
 - avoid leading questions; only prompting the learner where necessary with open questions to clarify information where necessary. For example 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.
 - Explain that information will only be shared with people who need to know in order to keep the learner safe.
 - be clear about boundaries and how the report will be progressed.
 - Never investigate or ask leading questions.
 - record the concern using the facts as the learner presents them, in line with the organisations record keeping requirements.
 - inform the DSL (or deputy), as soon as practically possible.
- Bear in mind that the learner may:
 - not feel ready, or know how to tell someone that they are being abused, exploited or neglected
 - not recognise their experiences as harmful
 - feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

Staff should remain professionally curious, recognising that learners may not disclose abuse directly or may minimise, delay or deny abuse.

- If staff have any concerns about a learner'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).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 4-5). In these circumstances, any action taken will be shared with a DSL as soon as is possible.
- All staff are made aware through regular training and in the induction process that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a learner is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping learners safe.
- Elmley Dray School will respond to safeguarding concerns in line with the Kent Safeguarding Children's Multi-Agency Partnership procedures (KSCMP)/Kent and Medway Safeguarding Adults Board (KMSAB).

- 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
 - KMSAB can be accessed here: [Kent & Medway SAB website](#)
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: www.kelsi.org.uk/support-for-learners-and-young-people/integrated-childrens-services
- Where a learner may benefit from Early Help, the DSL (or Deputy DSL) will lead, coordinate and review the plan to ensure support remains effective and escalates where necessary. Any request for support will be made via the Front Door - [Front Door - KELSI](#).
- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via [Kent Safeguarding learners Multi-Agency Partnership](#) and [Safeguarding contacts - KELSI](#)
- All staff are made aware of the 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 learner 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.
- Where a learner is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the learners Act), a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures. If learners are from out of county, they will be referred to their council safeguarding team directly.
 - Elmley Dray School recognises that in situations where there are immediate learner protection concerns for a learner 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 an Area Education Safeguarding Advisor – [Safeguarding contacts - KELSI](#)/ [Report abuse - Kent County Council](#) before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In the event of a request for support to the Front Door 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 be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a learner at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a learner or young person'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 Safeguarding learners Multi-Agency Partnership Escalation Procedures](#), (or relevant local authority escalation procedures) to ensure their concerns have been addressed and, most importantly, that the learner or young person's situation improves. Professional challenge and escalation are expected where practitioners believe decisions do not adequately safeguard the learner.

3.4 Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the organisations safeguarding system (MyConcern) and the DSL will be alerted without delay. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.
- Records will be completed as soon as possible after the incident/event, using the learner's own words wherever possible, and will be dated, timed and attributed to the member of staff making the record. Safeguarding and learner protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed. Professional observations should be clearly distinguished from factual information where included.
- Records should be completed before the end of the working day and immediately where there is a risk of significant harm.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the online 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.
- Safeguarding and learner 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.
- Learner protection records will be kept confidential and stored securely. Safeguarding and learner protection records will be kept for individual learners and young people and will be maintained separately from all other records relating to the learner in the organisation. Learner protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All safeguarding and learner protection records will be transferred in accordance with data protection legislation to the learner's subsequent school (as applicable), under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Learner protection files will be transferred securely to the new DSL, separately to the learner's main file, and a confirmation of receipt will be obtained.
- In addition to the learner 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 learner leaving, for example, information that would allow the new school or college to continue to provide support.
- Where Elmley Dray School receives learner protection files from another setting, the DSL will ensure key staff will be made aware of relevant information as required.
- Where a learner joins the school and no learner protection files are received, the DSL will proactively seek to confirm from the previous setting whether any learner protections exist for the learners and young people, and if so, if the files have been sent.

3.5 If you discover that FGM has taken place or a learner is at risk of FGM

- Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.
- FGM is illegal in the UK and a form of learner abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.
- Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 3 of this policy.
- Any teacher who either:
 - o Is informed by a child under 18 that an act of FGM has been carried out on her; or
 - o Observes physical signs which appear to show that an act of FGM has been carried out on a child under 18 and they have no reason to believe that the act was necessary for the child’s physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority social care as appropriate.
- Any other member of staff who discovers that an act of FGM appears to have been carried out on a learner under 18 must speak to the DSL and follow our local safeguarding procedures.
- The duty for teachers mentioned above does not apply in cases where a learner is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.
- Any member of staff who suspects a learner is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures - [Kent and Medway safeguarding children procedures and strategies - Kent Safeguarding Children Multi-Agency Partnership \(kscmp.org.uk\)](https://www.kscmp.org.uk)

3.6 If you have concerns about extremism or radicalisation

- If a learner is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children’s social care. Make a referral to local authority social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority social care team.
- The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - o Think someone is in immediate danger
 - o Think someone may be planning to travel to join an extremist group
 - o See or hear something that may be terrorist-related

3.7 If you have a concern about mental health

- Mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.
- Mental health concerns will always be considered alongside safeguarding concerns and staff will be alert to the possibility that poor mental health may be both a cause and consequence of abuse or neglect.
- Staff will be alert to behavioural signs that suggest a learner may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a learner that is also a safeguarding concern, take immediate action.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
- Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

3.8 Allegations of abuse made against other learners

- We recognise that learners are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.
- We also recognise the gendered nature of child-on-child (herein referred to as learner-on-learner) abuse. However, all learner-on-learner abuse is unacceptable and will be taken seriously.

- Most cases of learners hurting other learners will be dealt with under our school's behaviour policy, but this learner protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
 - Is serious, and potentially a criminal offence
 - Could put learners in the school at risk
 - Is violent
 - Involves learners being forced to use drugs or alcohol
 - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 3 for more information about learner-on-learner abuse.

Procedures for dealing with allegations of learner-on-learner abuse

- If a learner makes an allegation of abuse against another learner:
 - You must record the allegation and tell the DSL, but do not investigate it
 - The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
 - The DSL will put a risk assessment and support plan into place for all learners involved (including the victim(s), the learner(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
 - The DSL will contact the learners and adolescent mental health services (CAMHS), if appropriate
- All incidents will be considered individually, recognising that abuse can occur between any learners regardless of age, gender, sex, disability, ethnicity or sexual orientation.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting learners and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of learner-on-learner abuse

- We recognise the importance of taking proactive action to minimise the risk of learner-on-learner abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

- o Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- o Ensure our curriculum helps to educate learners about appropriate behaviour and consent
- o Ensure learners are able to easily and confidently report abuse using our reporting systems
- o Ensure staff reassure victims that they are being taken seriously
- o Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- o Support learners who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- o Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- o Ensure staff are trained to understand:
 - How to recognise the indicators and signs of learner-on-learner abuse, and know how to identify it and respond to reports
 - That even if there are no reports of learner-on-learner abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a learner’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - learners can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A learner’s behaviour might indicate that something is wrong
 - That if they have any concerns about a learner’s welfare, they should act on them
 - That certain learners may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a learner harming a peer could be a sign that the learner is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing learner-on-learner abuse and responding where they believe a learner may be at risk from it
 - That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
 - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

3.9 Sharing of nudes and semi-nudes ('sexting')

- Elmley Dray School's approach is based on [guidance from the UK Council for Internet Safety](#) for all staff and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident

- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), including AI-generated or manipulated images ('deepfakes') where these appear to depict a learner, you must report it to the DSL immediately.
- You must **not**:
 - View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
 - Delete the imagery or ask the learner to delete it
 - Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
 - Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
 - Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the learner(s) that they will receive support and help from the DSL.

Initial review meeting

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
 - Whether there is an immediate risk to learner(s)
 - If a referral needs to be made to the police and/or children's social care
 - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
 - What further information is required to decide on the best response
 - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
 - Whether immediate action should be taken to delete or remove images or videos from devices or online services
 - Any relevant facts about the learners involved which would influence risk assessment
 - If there is a need to contact another school, college, setting or individual
 - Whether to contact parents or carers of the learners involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
 - The incident involves an adult. Where an adult poses as a learner to groom or exploit a learner or young person, the incident may first present as a learner-on-learner incident. See appendix 3 for more information on assessing adult-involved incidents
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
 - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - The imagery involves sexual acts and any learner in the images or videos is under 13
 - The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

- If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

- They will hold interviews with the learners involved (if appropriate).
- If at any point in the process there is a concern that a learner has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

- The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the learner at risk of harm.

Referring to the police

- If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents

- All incidents of sharing of nudes and semi-nudes, and the decisions, rationale, actions taken and outcomes in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

- Learners are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and PSHE programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
 - o What it is
 - o How it is most likely to be encountered
 - o The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
 - o Issues of legality
 - o The risk of damage to people's feelings and reputation
- Learners also learn the strategies and skills needed to manage:
 - o Specific requests or pressure to provide (or forward) such images
 - o The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with learners so they are aware of the processes the school will follow in the event of an incident.
- Teaching follows best practice in delivering safe and effective education, including:
 - o Putting safeguarding first
 - o Approaching from the perspective of the learner
 - o Promoting dialogue and understanding
 - o Empowering and enabling learners and young people
 - o Never frightening or scare-mongering

- o Challenging victim-blaming attitudes

3.10 Reporting systems for our learners

- Where there is a safeguarding concern, we will take the learner's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
 - o Put systems in place for learners to confidently report abuse
 - o Provide multiple reporting routes to ensure learners can raise concerns in ways that feel safe and accessible to them
 - o Ensure our reporting systems are well promoted, easily understood and easily accessible for learners
 - o Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback
 - o Inform learners of our reporting systems and processes, through our relationships and sex education, and PSHE curriculum, ensuring they are aware of who the safeguarding team are and where they can go for support
 - o Provide reassurance following disclosures to ensure learners feel safe in submitting any concerns

3.11 Multi-agency working

- Elmley Dray School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children' and [Kent & Medway SAB website](#)
- The leadership team, Directors and PAT together with the DSL for Elmley Dray School, will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- Elmley Dray School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote learner'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/Vulnerable Adults Protection Conferences, Core Groups, Strategy Meetings, Children in Need meetings or other early help multi-agency meetings.

- Elmley Dray School will allow access for Kent Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The Proprietor Director, Headteacher/DSL and Chair of Governors are aware of the requirement for learners to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school/college 'Searching, Screening and Confiscation' policy and/or behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.
- The school will contribute fully to multi-agency safeguarding arrangements and will share relevant information promptly and lawfully to promote the welfare of learners.

3.12 Confidentiality and information sharing

- Elmley Dray School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to learner protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Elmley Dray School has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our organisation is compliant with all matters relating to confidentiality and information sharing requirements.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping learners 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 learners (KCSIE 2026). KCSIE 2026, the [Information Commissioner's Office](#) (ICO) and the DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) guidance provides further details regarding information sharing principles and expectations.
- The DSL will disclose relevant safeguarding information about learners and young people 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 GDPR, Privacy and Confidentiality policy which is available on our website.
- All staff 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 learners; this may include sharing information with the DSL and with other agencies as appropriate.

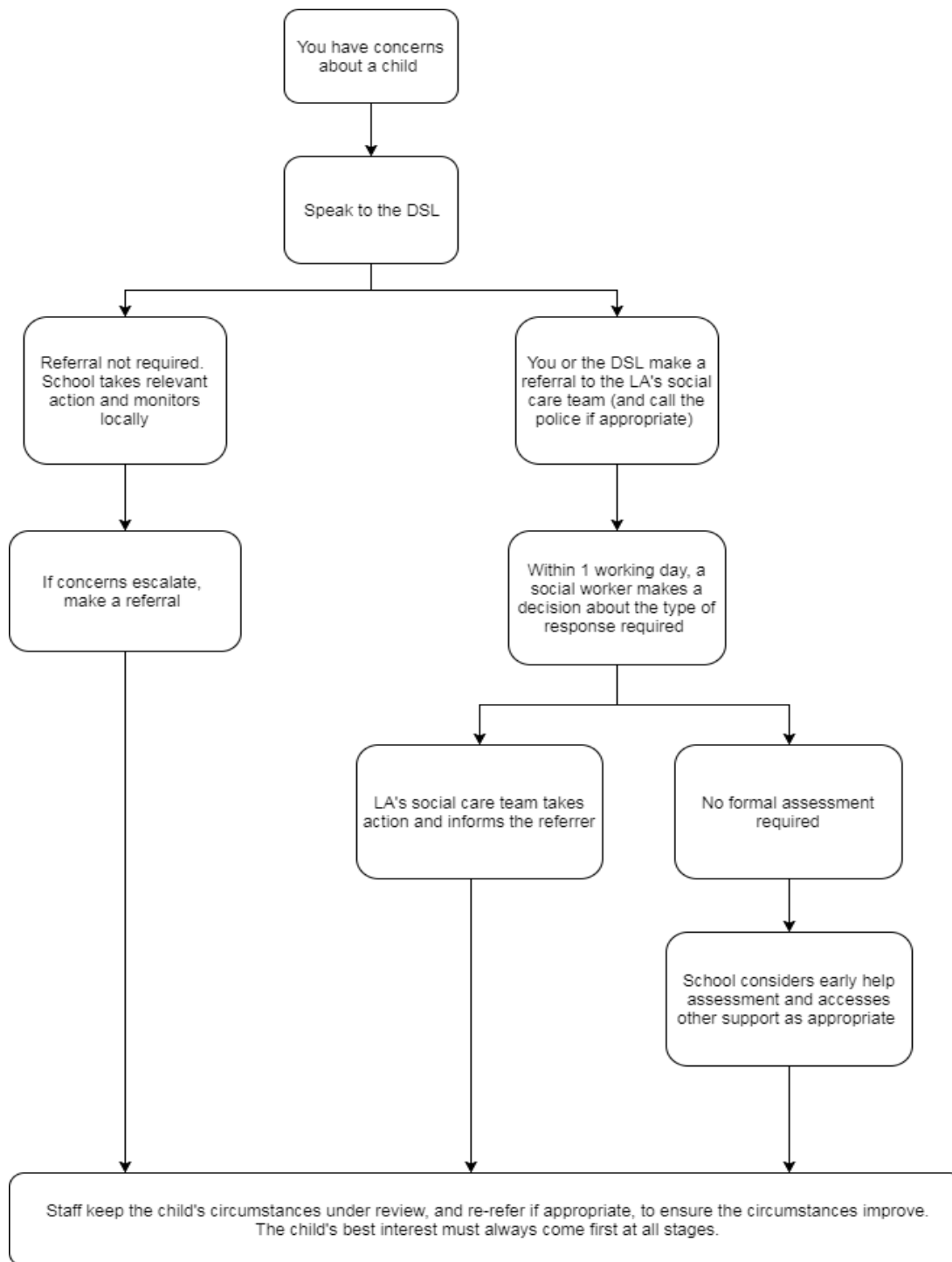
- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a learner that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the learner.
- Staff should never assume another professional has taken action.
- The safety and welfare of the learner will always be the overriding consideration when making decisions about information sharing.

3.13 Complaints

- Elmley Dray School community should feel able to raise or report any concerns about learner safety or potential failures in the organisation's safeguarding regime. There is a complaints procedure available to parents, learners, members of staff and visitors who wish to report concerns or complaints. This can be found within the Compliments, Concerns and Complaints Policy and within the Whistleblowing Policy.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Learners, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk. Learners and families may also access Childline (0800 1111) where appropriate.
- Staff can also access the NSPCC [Whistleblowing Advice Line](#) if they do not feel able to raise concerns regarding learner protection failures internally on 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at Elmley Dray School will take all concerns reported to the organisation 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.

Figure 1: procedure if you have concerns about a learner's welfare (as opposed to believing a learner is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action) *Reference to child also includes vulnerable adults for the purpose of this flowchart.



4 Supporting Learners Potentially at Greater Risk of Harm

- Whilst all learners should be protected, Elmley Dray School recognises that some learners may be at greater risk of abuse, neglect or exploitation due to their individual circumstances, vulnerabilities or lived experiences. Staff will be particularly alert to these additional vulnerabilities and ensure that appropriate support is provided at the earliest opportunity.

4.1 Safeguarding Learners with Special Educational Needs or Disabilities (SEND)

- Elmley Dray School works predominantly with learners who have Special Educational Needs and Disabilities (SEND). We recognise that learners with SEND and certain medical or physical health conditions can face additional safeguarding challenges and barriers to recognising abuse, communicating concerns and accessing support.
- Elmley Dray School recognises that learners and young people with SEND may face additional communication needs, cognitive differences and additional barriers to recognising or reporting abuse. Learners with SEND will be supported using communication approaches appropriate to their individual needs to ensure that their wishes, feelings and lived experiences are heard, understood and acted upon.
- All staff will remain professionally curious and will not assume that changes in behaviour, communication, mood, presentation or physical injuries are solely related to a learner's disability, medical condition or additional needs.
- Staff recognise that learners with SEND may be disproportionately affected by bullying (including prejudice-based bullying), online abuse, exploitation, isolation and peer-on-peer abuse.
- Members of staff are encouraged to be aware that learners 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, Elmley Dray School will always consider providing additional pastoral, therapeutic and safeguarding support where required, based upon individual risk assessment.
- The DSL will work closely with teaching staff, therapists, families and external agencies to ensure safeguarding plans appropriately reflect each learner's communication needs, vulnerabilities and protective factors.
- The health, safety, independence, and welfare of learners is promoted, and their dignity and privacy are respected at Elmley Dray School. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems which are agreed with the learners and young people, parents and carers.

4.2 Children Missing from Education (CME)

- Children Missing Education (CME) is a significant safeguarding indicator. Persistent absence, prolonged absence and missing education can be indicators of abuse, neglect, child sexual exploitation (CSE), child criminal exploitation (CCE), serious violence, county lines, forced marriage, female genital mutilation (FGM) or other safeguarding concerns.
- The school will hold at least two emergency contacts for every learner wherever possible, in accordance with DfE guidance, so we have additional options to make contact with a responsible adult if a learner missing education is also identified as being a welfare and/or safeguarding concern. Elmley Dray School will also hold information on contact for parents, carers and learners and young people so that, if required, they can act on any vital warning sign to a range of safeguarding issues (see above point)
- Where concerns arise that a learner is missing education, the school will act promptly in accordance with statutory guidance, local authority procedures and the school's attendance procedures. Safeguarding concerns will always take priority.

4.3 Elective Home Education (EHE)

- The school recognises that Elective Home Education is not, in itself, a safeguarding concern. However, where safeguarding concerns exist, these will be referred to Children's Social Care before a learner is removed from roll where appropriate.
- Where a parent/carer expresses their intention to remove a learner 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 learner.

4.4 Learners who need a social worker

- The DSL will maintain effective communication with social workers and other professionals involved with learners to ensure safeguarding, welfare and educational outcomes are promoted.
- Staff recognise that learners with a social worker may require additional support because of safeguarding or welfare needs and will be alert to changes in presentation, attendance, behaviour or wellbeing. Where learners have a social worker, this will inform school decisions about their safety and promote their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

4.5 Learners who are looked after and previously looked after learners and care leavers

- Elmley Dray School recognises that children who are looked after, previously looked after and care leavers may have experienced abuse, neglect, trauma or disrupted attachments and may therefore require additional safeguarding and pastoral support.

- The school will appoint a [Designated Teacher for Looked After and Previously Looked After Children](#) who will be the Assistant Headteacher - SENDCo and DDSL, who works with local authorities, including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered learners who are looked after or who have been previously looked after.
- The Designated Teacher and DSL will work collaboratively to ensure Personal Education Plans (PEPs), safeguarding arrangements and educational support complement one another.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a learner'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 learner 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 learner.
- Staff will be alert to indicators that a learner may be privately fostered and will notify the Local Authority promptly where such arrangements are identified.
- Where a learner 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.

4.6 Learners who are lesbian, gay, bisexual, transgender, questioning or perceived to be LGBTQ+

- A learner being or being perceived as LGBTQ+ is not, in itself, a safeguarding concern or risk factor, however, Elmley Dray Schools recognises that learners who are LGBTQ+ or are perceived by other learners to be LGBTQ+ (whether they are or not) can be targeted by other learners or others within the wider community.
- Elmley Dray School recognises that learners who are LGBTQ+ may experience discrimination, prejudice, bullying, harassment or abuse, particularly where they lack a trusted adult with whom they can discuss their experiences.
- The school will foster an inclusive culture where diversity is respected. Learners will be supported through an inclusive curriculum, positive relationships and access to trusted adults. Staff will challenge discriminatory language or behaviour and ensure that all learners feel safe, respected and able to report concerns.

4.7 Learners experiencing additional vulnerabilities

- Elmley Dray School recognises that learners may face multiple and overlapping vulnerabilities. Staff will be alert to learners who are young carers, bereaved, living in families affected by domestic abuse, parental substance misuse, parental mental ill health, poverty, housing insecurity, exploitation, serious youth violence or

adverse childhood experiences (ACEs). These learners may require additional safeguarding support, early help or targeted intervention.

5 Online Safety

- It is essential that learners are safeguarded from potentially harmful and inappropriate material or behaviours online. Elmley Dray School has an Online Safety Policy and has adopted 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.
- Online safety is an integral part of safeguarding and applies equally to online and offline environments. Staff recognise that technology can facilitate abuse, exploitation, bullying, radicalisation and other forms of harm, and will remain alert to the changing nature of online risks.
- Elmley Dray School ensures that online safety is considered as a core safeguarding theme across all policies, procedures, curriculum planning, staff training, DSL responsibilities, filtering and monitoring arrangements and engagement with parents and carers.
- Elmley Dray School identifies that the range of online safeguarding risks is continually evolving and includes risks relating to content, contact, conduct and commerce:
 - Content: being exposed to illegal, inappropriate or harmful content including AI-generated or manipulated content, misinformation, disinformation, extremist material, harmful online challenges and content encouraging self-harm or suicide.
 - Contact: being subjected to harmful online interaction with other users, including online grooming, coercion, exploitation, cyberbullying and contact from individuals seeking to harm or exploit learners.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm, including creating, sharing, receiving or requesting sexualised images or content, including consensual and non-consensual sharing of nudes and semi-nudes, AI-generated sexual imagery and pornography.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams, including online scams, financial exploitation, phishing, gambling-related harms and inappropriate commercial influence.
- Elmley Dray School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out regular reviews of our online safety approaches, including an annual review of filtering and monitoring effectiveness, online safety education, emerging risks, incidents, and the impact of preventative measures.
- The Headteacher will be informed of any online safety concerns by the DSL, as appropriate. The safeguarding governor will receive regular reports on online safety practice, filtering and monitoring arrangements, safeguarding incidents, themes, actions taken and outcomes. The governing body will ensure that online safety remains a strategic safeguarding priority.

Please also refer to our online safety policy.

5.1 Policies and procedures

- The Headteacher retains overall accountability for online safety. The DSL (whom is also the Headteacher) leads on safeguarding responses to online safety concerns and works closely with senior leaders, IT providers and relevant staff to ensure effective systems and procedures are in place.
- The DSL will respond to online safety concerns in line with this policy and other associated policies, including anti-bullying and behaviour policies.
- The school will ensure that online safety concerns are recorded, reviewed and responded to in line with safeguarding procedures, including where concerns relate to online abuse, exploitation, bullying, sexual harassment or harmful content.
- Elmley Dray School 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.
- Elmley Dray School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2026 and the UK Safer Internet Centre guidance as to what “appropriate” filtering and monitoring might look like, Elmley Dray School has clear expectations regarding mobile phones, smart technology, cameras, wearable technology and the recording or sharing of images. These expectations are communicated to learners, staff and parents/carers and reviewed regularly.

5.2 Appropriate filtering and monitoring

- Elmley Dray School will take all reasonable steps to protect learners from harmful and inappropriate content through effective filtering and monitoring systems. These systems will be proportionate, regularly reviewed and managed in accordance with current DfE filtering and monitoring standards, including the DfE Filtering and Monitoring Standards and Keeping Children Safe in Education guidance.
- Elmley Dray School uses Smoothwall filtering and monitoring software to support the school's approach to online safety. Smoothwall provides filtering and monitoring functionality designed to identify and manage access to inappropriate or harmful online content, support safeguarding responses and provide reporting information to designated staff.
- The DSL, safeguarding team, senior leaders and relevant staff will maintain an appropriate understanding of the filtering and monitoring systems in place, including:
 - the purpose and capabilities of the system;
 - how filtering and monitoring alerts are generated and reviewed;
 - known limitations of automated systems;

- escalation routes where concerns are identified;
 - how effectiveness is reviewed and improved.
- The school will ensure there is clear ownership of filtering and monitoring arrangements, including responsibility for:
 - reviewing monitoring reports and alerts;
 - responding to inappropriate access attempts or breaches;
 - liaising with IT providers where required;
 - ensuring systems remain effective and appropriate for the needs of learners.
 - If learners or staff discover unsuitable sites or material, they must report this immediately to a member of staff or the DSL so that appropriate action can be taken. Where necessary, access to devices or systems may be suspended while concerns are investigated.
 - All users will be informed that use of school systems may be monitored and that monitoring will be carried out in accordance with data protection, privacy and human rights legislation.
 - Filtering breaches, attempted access to harmful content or concerns identified through monitoring will be recorded, reviewed and referred to the DSL where appropriate.
 - Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation (IWF) and/or the police.
 - When implementing filtering and monitoring arrangements, Elmley Dray School will ensure that over-blocking does not result in unreasonable restrictions on teaching, learning or safeguarding education.
 - Whilst filtering and monitoring is an important part of the school's online safety responsibilities, it is only one element of a wider whole-school approach. Effective supervision, education, staff training, appropriate use policies and responsive safeguarding procedures remain essential.

5.3 Information security and access management

- Elmley Dray School 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.
- Elmley Dray School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
- The school will ensure that access to systems and information is appropriately controlled, including the use of secure passwords, account permissions and safe handling of personal information.

5.4 Remote/Online learning

Specific guidance for DSLs and SLT regarding remote learning is available at

- DfE: [Providing remote education – guidance and expectations for schools](#)
- NSPCC: [Undertaking remote teaching safely](#)
- The Education People: [Remote Learning Guidance for SLT](#)

- Elmley Dray School 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 and any local/national guidance.
- All communication with Elmley Dray School learners, parents or carers will take place using organisational or school provided or approved communication channels.

Any circumstances where normal communication arrangements cannot be followed must be discussed with the DSL and agreed by school leaders.

- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy and organisational code of conduct.
- Remote learning arrangements will continue to follow safeguarding, behaviour, data protection and acceptable use expectations.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our learner protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)

5.5 Artificial Intelligence (AI)

- Generative artificial intelligence (AI) tools are increasingly accessible and may provide opportunities to enhance teaching, learning and safeguarding practice. However, AI also creates emerging safeguarding risks, including the creation of harmful content, deepfakes, impersonation, misinformation, cyber risks, grooming and the creation or sharing of sexualised images without consent.
- The school will ensure that staff and learners understand the responsible and safe use of AI technologies and recognise that AI-generated content may not be accurate, appropriate or safe.
- Elmley Dray School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard learners. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose learners to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- Elmley Dray School will treat any use of AI to access harmful content or bully learners in line with this policy, our AI policy and behaviour policy.
- Staff must consider safeguarding, data protection, privacy and ethical implications before introducing AI tools within teaching or school systems. Any approved use of AI must follow the school's AI policy and risk assessment processes.

5.6 Staff training

- Elmley Dray School will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

5.7 Educating learners

- Elmley Dray School will ensure a comprehensive whole school curriculum response is in place, in line with the *UK Council for Internet Safety (UKCIS)* [‘Education for a Connected World Framework’](#) and *DfE ‘Teaching online safety in school’ guidance*, to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.
- Online safety education will be appropriate to learners' age, developmental stage and individual needs, including consideration of SEND and communication needs.

5.8 Working with parents/carers

- Elmley Dray School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits, opportunities and safeguarding risks associated with technology use.
- Elmley Dray School will ensure parents and carers understand that the school uses filtering and monitoring systems, including Smoothwall, to help protect learners from harmful and inappropriate online content. Parents and carers will be informed about how online safety is taught, what systems are used to support safe internet access, and how concerns can be reported.
- Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE [‘Harmful online challenges and online hoaxes’](#) guidance to ensure we adopt a proportional and helpful response.
- Parents and carers will be signposted to reliable sources of support and guidance to help them understand emerging online risks, including AI-generated content, online exploitation and harmful online challenges.

5.9 Responding to online safeguarding incidents

- Where an online safeguarding concern is identified, Elmley Dray School will respond promptly and proportionately. This may include preserving evidence, reporting harmful content, supporting affected learners, informing parents/carers where appropriate, referring to external agencies and reviewing preventative measures.
- Learners will be supported to report concerns and understand that seeking help will always be taken seriously.

6 Staff Engagement and Expectations

6.1 Staff awareness, induction and training

Elmley Dray School recognises that safeguarding is everyone's responsibility. All staff are expected to maintain a child-centred approach, act immediately on concerns, and understand their role in protecting and promoting the welfare of learners.

All members of staff will be provided with a copy of Part 1 of *Keeping Children Safe in Education (KCSIE) 2026* and must read and understand the safeguarding information contained within it. All staff will also receive information about the school's safeguarding procedures, including the identity and role of the Designated Safeguarding Lead (DSL) and deputy DSLs, reporting procedures, and the school's approach to supporting learners who may require early help or additional safeguarding support.

The DSL, deputy DSLs, Headteacher and members of the Proprietor Advisory Team (PAT)/governance arrangements will read KCSIE 2026 in its entirety. The DSL and deputies will ensure that their safeguarding knowledge and practice are kept up to date through regular updates, professional development, networking with safeguarding professionals and engagement with local safeguarding arrangements.

All staff, including supply staff, agency staff, volunteers and third-party contractors working with learners, will receive safeguarding and child protection training as part of their induction. This training will include:

- the school's safeguarding and child protection procedures;
- recognising signs and indicators of abuse, neglect, exploitation and other safeguarding risks;
- responding appropriately to disclosures and concerns;
- the role of the DSL and safeguarding team;
- information sharing and recording requirements;
- online safety, including awareness of online harms and staff responsibilities in relation to filtering and monitoring systems;
- behaviour expectations, professional boundaries and safer working practices;
- the Prevent duty and awareness of risks relating to radicalisation and extremism.

Staff will complete safeguarding and child protection training at induction and receive regular updates at least annually, and more frequently where required, through staff briefings, meetings, email updates, professional learning sessions or other appropriate methods.

All staff will complete Prevent awareness training in line with statutory expectations. The DSL, Prevent lead and any staff with specific responsibilities for Prevent will undertake additional training to ensure they have the knowledge and skills required to fulfil their roles effectively.

All governors, directors and members of the Proprietor Advisory Team will receive appropriate safeguarding and online safety training at induction and will maintain their knowledge through regular updates. This training will enable them to provide effective strategic challenge and assurance that safeguarding arrangements are robust, effective and continually improving.

The DSL and deputy DSLs will undertake formal safeguarding and child protection training at least every two years, alongside regular updates to maintain their knowledge and skills. The DSL and relevant Prevent lead will undertake enhanced Prevent training, including awareness of extremist and terrorist ideologies.

Online safety training will form part of the school's wider safeguarding approach and will be embedded within staff training, curriculum planning and digital safety arrangements. Staff will understand their responsibilities in supporting safe technology use and responding to online safeguarding concerns.

Elmley Dray School values the expertise developed by staff through safeguarding training and daily safeguarding practice. Staff are encouraged to contribute to the ongoing development of safeguarding arrangements, policies and procedures through consultation, training discussions, reflective practice and feedback opportunities.

The Headteacher/DSL will provide reports to the PAT and Directors regarding safeguarding training completed by staff and will maintain accurate records of safeguarding training, induction and updates.

At least one person involved in any recruitment process will have completed safer recruitment training. This training will reflect the requirements of KCSIE 2026 and local safeguarding procedures. Further information is contained within the school's Safer Recruitment Policy.

6.2 Safer working practice

All staff, volunteers, agency workers and third-party staff are required to work in accordance with Elmley Dray School's expectations for safe and professional practice, as outlined within the Staff Code of Conduct, safeguarding policies and ICT Policy including Acceptable Use.

The DSL will ensure that all staff understand:

- their safeguarding responsibilities;
- how to report concerns about learners;
- how to report concerns or allegations regarding adults working within the school;
- the importance of maintaining professional boundaries.

Staff must follow the school's behaviour management procedures and understand the needs of the learners they support. Any use of physical intervention or reasonable force must be necessary, proportionate and carried out in accordance with the school's policies and relevant national guidance.

Staff will be made aware of the professional risks associated with the use of social media, electronic communication, personal devices and online platforms. Staff must ensure that their conduct reflects professional standards and complies with the Staff Code of Conduct and Acceptable Use Policy.

6.3 Supervision and support

The induction process will ensure that all new staff and volunteers understand their safeguarding responsibilities and know the procedures to follow if they have concerns about a learner's safety or welfare.

Elmley Dray School will provide appropriate supervision, guidance and support to ensure that:

- all staff understand and are competent to carry out their safeguarding responsibilities;
- staff are supported by the DSL and safeguarding team when managing concerns;
- staff receive opportunities to reflect on and improve their safeguarding practice.

Any member of staff affected by safeguarding concerns, disclosures or incidents involving learners will be able to access support from the DSL and senior leaders.

Where appropriate, the DSL may signpost staff to external sources of professional support, including their professional association, trade union, Education Support or other suitable wellbeing services.

7 Safer Recruitment and Allegations Against Staff

7.1 Safer recruitment and safeguarding checks

Elmley Dray School is committed to developing and maintaining a strong safeguarding culture and ensuring that robust recruitment procedures are followed to prevent unsuitable individuals from working with children and young people.

The school will follow the requirements set out in *Keeping Children Safe in Education (KCSIE) 2026*, particularly Part Three (Safer Recruitment), together with guidance issued by the Disclosure and Barring Service (DBS) and local safeguarding arrangements.

The Proprietor/Director, Chair of Governors, Proprietor Advisory Team (PAT) and Leadership Team are responsible for ensuring that safe recruitment procedures are implemented effectively and that all necessary pre-employment safeguarding checks are completed before individuals begin working with learners.

At least one member of every recruitment panel will have completed appropriate safer recruitment training and will understand how to apply safer recruitment principles throughout the recruitment process.

Elmley Dray School maintains an accurate and up-to-date Single Central Record (SCR) in accordance with statutory requirements. The SCR provides evidence that appropriate recruitment and safeguarding checks have been completed for all relevant staff, including:

- identity checks;
- right to work checks;
- enhanced DBS checks and barred list checks where required;
- prohibition checks where applicable;
- qualifications and professional registrations where required;
- overseas checks where applicable;
- further checks required for specific roles.

The SCR is regularly reviewed and audited by the school to ensure continued compliance with statutory guidance.

All applicants, including staff, volunteers and contractors, are required to disclose information that may affect their suitability to work with learners, including relevant convictions, cautions, court orders, reprimands or warnings where required by legislation.

Where applicable, Elmley Dray School will comply with the requirements of the Childcare (Disqualification) Regulations 2009 (as amended) and will ensure appropriate checks are undertaken for individuals working in relevant childcare provision.

Where Elmley Dray School places a learner with an alternative provision provider, the school retains overall responsibility for the safeguarding of that learner. Appropriate checks and due diligence will be undertaken to ensure that the provider has suitable safeguarding arrangements in place, including confirmation that appropriate safeguarding checks have been completed for individuals working with learners.

Where Elmley Dray School arranges work experience placements, appropriate safeguarding checks and risk assessments will be completed in line with the requirements and advice contained within KCSIE 2026.

7.2 Allegations and concerns raised in relation to staff, including supply teachers, volunteers and contractors

Elmley Dray School takes all allegations and concerns about adults working in or on behalf of the school seriously. All concerns and allegations will be recorded, considered and managed promptly in accordance with Part Four of *Keeping Children Safe in Education (KCSIE) 2026* and Kent Local Authority Designated Officer (LADO) procedures.

The purpose of managing allegations effectively is to protect learners, ensure appropriate action is taken, and safeguard staff from potential misunderstandings or unfounded allegations.

If a concern or allegation is raised about a member of staff, including a supply teacher, volunteer, contractor, agency worker or third-party staff member, it must be reported immediately to the Headteacher.

Where the concern or allegation relates to the Headteacher, it must be reported to the Chair of Governors/Proprietor.

Where the concern relates to the Chair of Governors/Proprietor, advice must be sought directly from the Local Authority Designated Officer (LADO).

The Headteacher, or appropriate case manager, will follow the procedures set out in KCSIE 2026 and seek advice from the LADO where required.

Where there is uncertainty about whether a concern meets the threshold for referral, advice will be obtained from the LADO before deciding on the appropriate course of action.

Where an allegation relates to an individual or organisation providing activities for learners on school premises, Elmley Dray School will follow the same safeguarding procedures and seek appropriate advice from the LADO.

Where relevant to the provision of early years childcare, the school will notify Ofsted of allegations and actions taken within the required timescales.

Following the conclusion of any allegation process, the Headteacher/appropriate case manager will review the circumstances and consider whether any learning, improvements to practice or changes to safeguarding procedures are required.

7.2.1 Concerns that meet the ‘harm threshold’

Elmley Dray School recognises that concerns may arise about any adult working in or on behalf of the school, including staff, volunteers, governors, contractors, agency workers, supply teachers and third-party providers.

An allegation meets the harm threshold where an individual has:

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

All allegations meeting this threshold will be managed in accordance with Part Four of KCSIE 2026.

The Headteacher will normally act as the case manager for allegations against staff. Where the allegation relates to the Headteacher, the Chair of Governors/Proprietor will act as case manager.

The case manager will contact the LADO without delay to discuss the concern and agree appropriate next steps.

Suspension of an individual will not be an automatic response to an allegation and will only be considered where there is no reasonable alternative. Decisions regarding suspension will be made in consultation with the LADO and in accordance with KCSIE guidance.

7.2.2 Concerns that do not meet the ‘harm threshold’ (Low-level concerns)

Elmley Dray School recognises the importance of identifying and responding to concerns about adults working in or on behalf of the school at the earliest opportunity.

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and which does not meet the harm threshold or require referral to the LADO.

Low-level concerns may arise from a range of sources, including:

- a learner, parent or colleague raising a concern;
- observations of behaviour;
- complaints or allegations;
- information identified through safeguarding or recruitment processes.

All low-level concerns will be shared responsibly, recorded appropriately and dealt with proportionately. A culture of openness enables the school to identify inappropriate behaviour early, support professional boundaries and reduce the risk of harm.

All low-level concerns must be reported to the Headteacher. The Headteacher is responsible for ensuring that concerns are recorded, considered and responded to appropriately.

Where appropriate, advice may be sought from the DSL, senior leaders or the LADO, particularly where there is uncertainty about whether the concern meets the harm threshold.

Low-level concerns relating to supply staff, contractors or agency workers will be shared with the relevant employer or organisation so that patterns of behaviour can be identified and appropriate action taken.

Low-level concern records will be:

- stored securely;
- treated confidentially;
- reviewed periodically to identify patterns of behaviour;
- retained in accordance with data protection legislation and the school's retention procedures.

Where a pattern of concerning behaviour is identified, the school will take appropriate action, which may include seeking advice from the LADO and following relevant disciplinary procedures.

7.3 Safe Culture

Elmley Dray School is committed to creating and maintaining an open, transparent and positive safeguarding culture where all adults understand their responsibilities and feel confident raising concerns.

The values and expectations outlined within the Staff Code of Conduct are reinforced through induction, training, supervision and ongoing professional dialogue.

Staff are encouraged to self-refer if they believe they have placed themselves in a situation that could be misinterpreted, may appear compromising, or where they recognise that their behaviour has fallen below expected professional standards.

All staff and volunteers should feel confident raising concerns about poor or unsafe practice, safeguarding failures or behaviours that may place learners at risk. The Proprietor/Directors, PAT and Leadership Team will take all concerns seriously and ensure they are responded to appropriately.

All staff are made aware of the school's Whistleblowing Policy. It is a disciplinary matter not to report concerns about the conduct of another colleague where that conduct may place a learner at risk.

Where staff do not feel able to raise concerns internally, they may seek advice from appropriate external organisations, including the NSPCC Whistleblowing Advice Line.

Elmley Dray School has a legal duty to refer individuals to the Disclosure and Barring Service (DBS) where the conditions for referral are met. This includes situations where an individual has harmed or poses a risk of harm to a learner and has been removed from regulated activity, or would have been removed had they not left the organisation.

The duty to refer applies regardless of whether the individual resigns, retires, is dismissed or otherwise leaves employment.

Where a DBS referral is required, Elmley Dray School will make the referral as soon as possible and in accordance with statutory guidance and advice from the LADO where appropriate.

8 Opportunities to Teach Safeguarding

- Elmley Dray School recognises that safeguarding is a shared responsibility and that effective safeguarding education is a fundamental part of preparing learners for life in modern Britain. The school will ensure that learners are taught about safeguarding, including online safety, through a broad, balanced and inclusive curriculum. This learning is embedded through Relationships, Sex and Health Education (RSHE), PSHE, Life Skills and other curriculum areas where appropriate.
- Elmley Dray School recognises the important role education plays in helping learners understand what safe and respectful relationships look like, recognise appropriate boundaries between learners and adults, identify when they or others may be unsafe, and understand how to seek help and support. The curriculum provides opportunities for learners to develop self-awareness, confidence, resilience, emotional understanding, assertiveness and decision-making skills so that they can recognise risks, make informed choices and protect themselves and others.
- Online safety education forms an integral part of the school's safeguarding approach. Learners are supported to understand the opportunities and risks associated with technology and online communication, including online relationships, cyberbullying, harmful content, online abuse, exploitation, manipulation, privacy, personal information and how to report concerns or seek support.
- Elmley Dray School recognises the crucial role it plays in preventative education. Preventative education is most effective when delivered through a whole-school approach which prepares learners for life in modern Britain and promotes respect, equality, diversity and healthy relationships. The school promotes a culture where sexism, misogyny, misandry, homophobia, biphobia, sexual violence, sexual harassment and all forms of discrimination are not tolerated.
- Through our curriculum and wider school culture, learners are supported to understand consent, personal boundaries, respectful behaviour and the importance of treating others with dignity and respect. We recognise that some learners may have experienced trauma, abuse or adversity and therefore provide opportunities to develop emotional resilience, positive mental health strategies and the confidence to seek support when needed.
- Elmley Dray School has a clear set of values and expectations which are embedded throughout all aspects of school life. These values are reinforced through our behaviour policy, pastoral support systems and planned programme of evidence-informed RSHE and

safeguarding education. Our curriculum is inclusive and carefully planned to ensure that content is appropriate to the age, stage of development and individual needs of all learners.

- The school recognises that a one-size-fits-all approach is not appropriate for all learners. Safeguarding education and support will therefore be adapted and contextualised to reflect the specific needs, vulnerabilities, experiences and circumstances of individual learners.
- All learners are encouraged to speak to a trusted member of the Elmley Dray School team if they have concerns about themselves or others. All staff understand their responsibility to listen to learners, take concerns seriously, report safeguarding issues appropriately and ensure that learners receive the support they need.

9 Physical Safety

9.1 Use of reasonable force

Elmley Dray School recognises that there may be circumstances where staff need to use reasonable force to prevent a learner from causing harm to themselves, another person or significant damage to property.

Any use of reasonable force will always be:

- necessary;
- proportionate;
- reasonable in the circumstances; and
- carried out in accordance with relevant legislation, Department for Education guidance, and the school's Behaviour Policy and Positive Handling procedures.

All staff will receive appropriate information and guidance regarding behaviour management, de-escalation strategies and the circumstances in which physical intervention may be required.

Further information regarding the school's approach to managing behaviour and the use of reasonable force can be found within the Behaviour Policy.

This section applies to the school/DfE education provision element of Elmley Dray School's services.

9.2 Use of premises by other organisations

Where services, activities or lettings are provided by another organisation using Elmley Dray School premises, the school will ensure that appropriate safeguarding arrangements are in place.

Before agreeing the use of premises, the Headteacher will seek written confirmation that the organisation:

- has appropriate safeguarding and child protection policies and procedures;
- has suitable procedures for managing concerns and allegations;
- has completed appropriate safeguarding checks for staff and volunteers working with learners;
- understands and agrees to comply with relevant safeguarding expectations.

Safeguarding requirements will be included within any agreement for the use of school premises, including leases, hire agreements or transfer of control arrangements.

Failure to comply with agreed safeguarding requirements may result in the withdrawal of permission to use the premises.

Where activities are arranged by external providers, Elmley Dray School will ensure appropriate oversight and due diligence are undertaken to ensure learners remain safeguarded.

9.3 Site security

All members of staff share responsibility for maintaining a safe and secure environment. Staff must remain vigilant and report any concerns relating to site security, visitors, premises, equipment or arrangements that may place learners or adults at risk.

Appropriate safeguarding checks will be undertaken for visitors, volunteers and individuals working on school premises in line with statutory guidance.

All visitors must:

- report to the school office/reception on arrival;
- sign in using the visitor management system;
- wear an appropriate visitor identification badge while on site;
- be supervised where required;
- follow the school's safeguarding and health and safety expectations.

Staff and visitors must comply with all safety and security arrangements implemented by the school.

Any person on site who is unknown, unauthorised or cannot be identified will be appropriately challenged and asked to provide clarification. Concerns will be reported immediately to a member of the leadership team.

Elmley Dray School will not tolerate behaviour from any individual, including parents, carers or visitors, which threatens the safety or wellbeing of learners, staff or visitors. Any behaviour that causes others to feel unsafe will be treated as a serious concern and may result in further action, including restrictions on access to the school site where appropriate.

10. Local Contacts and Support

All members of staff are made aware of local safeguarding support services and referral pathways. Staff understand that where a learner is at immediate risk of harm, urgent action must be taken.

Kent Children's Services – Integrated Front Door

For concerns about a child or young person:

Integrated Front Door: 03000 411111

Out of Hours Service: 03000 419191

If there is an immediate risk of harm:

Police: 999

Education Safeguarding Service

Safeguarding guidance and resources are available through the Kent Education Safeguarding Service and KELSI.

Online Safety Support

Education Safeguarding Service – Online Safety Team

Telephone: 03301 651500

Email: onlinesafety@theeducationpeople.org

(For non-urgent online safety advice and support.)

Local Authority Designated Officer (LADO)

Concerns and allegations relating to adults working with children should be reported to the LADO.

Telephone: 03000 410888

Email: kentlearnersslado@kent.gov.uk

Professional referrals should be submitted through the Kent children's services portal.

Kent Police

101 – non-emergency contact

999 – immediate risk of harm or emergency

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

Email: kscmp@kent.gov.uk
Website: www.kscmp.org.uk
Telephone: 03000 421126

Kent and Medway Safeguarding Adults Board (KMSAB)

Information and reporting procedures are available through the Kent and Medway Safeguarding Adults Board.

Adult Safeguarding

Kent Adult Social Care:
Telephone: 03000 416161
Text relay: 18001 03000 416161
Email: social.services@kent.gov.uk

Version control - Approval and review

Version No.	Reviewed By	Approved By	Approval Date	Main Change	Review Period
1	Emily Hollis MBE	Hayley Furnell	August 2024	Initial policy approved	Annually
2	Emily Hollis MBE	Hayley Furnell	August 2025	Annual review, KCSIE 2026 updates, change to DDSL	Annually
2.1	Emily Hollis MBE	Hayley Furnell	2nd December 2025	Updated to include additional DDSL	Annually
3	Emily Hollis MBE	Hayley Furnell	8 August 2026	Annual review, KCSIE 2026 updates, inclusion of additional DDSL	Annually

A handwritten signature in black ink, appearing to read 'H. Furnell', with a large, stylized initial 'H'.

Hayley Furnell, Director,
on behalf of Elmley Dray School

Dated: 8 August 2026

Next review: 8 August 2027

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect and safeguarding concerns are rarely isolated events and may overlap with one another. Children may experience multiple forms of harm at the same time and safeguarding concerns should always be considered in the context of the individual child's circumstances.

Abuse and neglect are forms of maltreatment. A child may be harmed by an adult or adults, another child or children, or through wider environmental factors. Abuse can happen within families, communities, institutions and online environments. It can be carried out by males or females and perpetrators may include adults or children.

All staff should be aware of the signs and indicators of abuse and understand that children may communicate their experiences in different ways. Any concern that a child may be suffering or at risk of suffering harm must be reported in line with the school's safeguarding procedures.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This may involve physical contact, including assault by penetration (such as rape or oral sex), or non-penetrative acts such as kissing, touching, masturbation or rubbing.

Sexual abuse may also include non-contact activities, such as involving children in viewing or producing sexual images, watching sexual activities, encouraging sexually inappropriate behaviour, sexual exploitation, or grooming a child in preparation for abuse, including through online platforms.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and young people.

Signs that MAY indicate sexual abuse include:

- sudden changes in behaviour, mood or emotional wellbeing;
- sexually inappropriate knowledge, language or behaviour for their age or developmental stage;
- unexplained gifts, money or access to resources;
- self-harm or thoughts of suicide;
- withdrawal, anxiety, depression or fearfulness;
- reluctance to change clothes or participate in activities such as PE;
- distrust of familiar adults;
- unexplained sexual health concerns, including sexually transmitted infections;
- regression to younger behaviours;
- disclosure of secrets or concerns about someone's behaviour towards them.

Physical abuse

Physical abuse involves causing physical harm to a child. This may include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing injury.

Physical harm may also be caused when a parent or carer fabricates or induces illness in a child.

Signs that MAY indicate physical abuse include:

- unexplained injuries or injuries that do not match the explanation provided;
- bruising, particularly in unusual places or patterns;
- bruising around the face, mouth, ears, eyes or soft areas of the body;
- fingertip bruising or marks on the torso;
- bite marks;
- burns or scalds, particularly those with unusual patterns;
- injuries suggesting the use of objects or repeated assaults;
- covering arms and legs despite hot weather;
- aggressive behaviour, severe temper outbursts or changes in behaviour;
- delay in seeking medical attention or inconsistent explanations for injuries.

Any injury should be considered in context. Inadequate, inconsistent or implausible explanations may indicate a safeguarding concern.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child which causes, or is likely to cause, serious and adverse effects on the child's emotional development.

It may involve:

- conveying that a child is worthless, unloved or inadequate;
- making a child feel valued only when meeting another person's needs;
- preventing a child from expressing their views;
- deliberately silencing, humiliating or ridiculing a child;
- imposing inappropriate expectations beyond the child's developmental ability;
- preventing normal social interaction, exploration or learning;
- overprotecting or restricting a child inappropriately;
- exposing a child to the ill-treatment of another person;
- serious bullying, including cyberbullying;
- causing a child to frequently feel frightened, unsafe or in danger;
- exploitation or corruption of a child.

Emotional abuse is present in all types of child maltreatment, although it may also occur independently.

Signs that MAY indicate emotional abuse include:

- low confidence or self-esteem;

- excessive need for approval, attention or affection;
- withdrawal or difficulty forming relationships;
- sudden changes in behaviour;
- extremes of passivity or aggression;
- self-harm;
- eating difficulties or disorders;
- speech or communication difficulties;
- fear of parents or carers being contacted;
- difficulty playing or interacting appropriately.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance misuse. After birth, neglect may involve a parent or carer failing to:

- provide adequate food, clothing or shelter;
- protect a child from harm or danger;
- provide appropriate supervision;
- ensure access to medical care or treatment;
- respond to a child's emotional needs.

Neglect may include abandonment, exclusion from home, inadequate care arrangements or failure to meet a child's developmental needs.

Signs that MAY indicate neglect include:

- persistent hunger;
- poor personal hygiene;
- tiredness or lack of energy;
- inadequate clothing;
- frequent lateness or non-attendance;
- untreated medical or dental needs;
- poor peer relationships;
- low self-esteem;
- weight loss or being consistently underweight;
- compulsive stealing or scavenging;
- running away;
- repetitive behaviours such as rocking, hair twisting or thumb sucking.

Additional safeguarding concerns

Staff should also be aware that safeguarding concerns may include, but are not limited to:

- child-on-child abuse, including bullying, sexual violence and sexual harassment;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE);

- domestic abuse;
- serious violence;
- online abuse and harmful online behaviour;
- grooming and exploitation;
- trafficking;
- radicalisation and extremist influences;
- harmful cultural practices.

All concerns must be taken seriously and reported in accordance with Elmley Dray School's safeguarding procedures.

Appendix 2: Support Organisations

Elmley Dray School recognises that learners, families and staff may require support from external organisations and specialist services. The organisations listed below provide advice, guidance and support relating to safeguarding, child protection, wellbeing and wider safeguarding concerns.

Contact details are reviewed periodically. If staff require advice or are unsure which service to contact, they should speak with the Designated Safeguarding Lead (DSL).

National Safeguarding Organisations

NSPCC – Report Abuse in Education Helpline

Telephone: 0800 136 663

Email: help@nspcc.org.uk

NSPCC

www.nspcc.org.uk

Barnardo's

www.barnardos.org.uk

Child Safeguarding Practice Review Panel

www.gov.uk/government/groups/child-safeguarding-practice-review-panel

Centre of Expertise on Child Sexual Abuse

www.csacentre.org.uk

Child Protection Resource Centre

www.nspcc.org.uk/keeping-children-safe

Support for Staff

Education Support Partnership

www.educationsupport.org.uk

UK Safer Internet Centre – Professionals Online Safety Helpline

www.saferinternet.org.uk/helpline

Harmful Sexual Behaviour Support Service

<https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for Children and Young People

Childline

www.childline.org.uk

Papyrus – Suicide Prevention Support

www.papyrus-uk.org

The Mix – Support for under 25s

www.themix.org.uk

Shout – Crisis Text Support

www.giveusashout.org

Fearless – Crime information and support

www.fearless.org

Victim Support

www.victimsupport.org.uk

Support for Families and Adults

Family Lives

www.familylives.org.uk

Victim Support

www.victimsupport.org.uk

Samaritans

www.samaritans.org

NAPAC – Support for adults abused in childhood

www.napac.org.uk

MOSAC – Support following child sexual abuse

www.mosac.org.uk

Action Fraud

www.actionfraud.police.uk

Advice Now

www.advicenow.org.uk

Support for Children with Additional Needs or Disabilities

Respond

www.respond.org.uk

Mencap

www.mencap.org.uk

Council for Disabled Children

councilfordisabledchildren.org.uk

Contextual Safeguarding and Resilience

Contextual Safeguarding Network

<https://contextualsafeguarding.org.uk>

Kent Resilience Hub

<https://kentresiliencehub.org.uk>

Substance Misuse Support

We Are With You

www.wearewithyou.org.uk

Talk to FRANK

www.talktofrank.com

Domestic Abuse Support

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 Initiative

www.mankind.org.uk

National Domestic Abuse Helpline

www.nationaldahelpline.org.uk

Respect Phoneline

<https://respectphoneline.org.uk>

Child Exploitation (including Criminal and Sexual Exploitation)

National Crime Agency

www.nationalcrimeagency.gov.uk

NWG Network – Child Exploitation Support

www.nwgnetwork.org

It's Not Okay – Child Exploitation Awareness

www.itsnotokay.co.uk

Children's Society – County Lines Toolkit

www.childrenssociety.org.uk

Honour-Based Abuse, Forced Marriage and FGM

Karma Nirvana

<https://karmanirvana.org.uk>

Forced Marriage Unit

www.gov.uk/guidance/forced-marriage

Mandatory Reporting of FGM Guidance

www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Child-on-Child Abuse, Sexual Violence and Harassment

Rape Crisis England and Wales

<https://rapecrisis.org.uk>

Brook – Sexual Health and Relationships Support

www.brook.org.uk

Disrespect Nobody

www.disrespectnobody.co.uk

Lucy Faithfull Foundation

www.lucyfaithfull.org.uk

Stop It Now!

www.stopitnow.org.uk

Parents Protect

www.parentsprotect.co.uk

Anti-Bullying Alliance

www.anti-bullyingalliance.org.uk

Kidscape

www.kidscape.org.uk

Bullying UK

www.bullying.co.uk

Online Safety

CEOP – Child Exploitation and Online Protection Command

www.ceop.police.uk

ThinkUKnow Online Safety Education

www.thinkuknow.co.uk

Internet Watch Foundation (IWF)

www.iwf.org.uk

Childnet

www.childnet.com

UK Safer Internet Centre

www.saferinternet.org.uk

Report Harmful Content

<https://reportharmfulcontent.com>

Marie Collins Foundation

www.mariecollinsfoundation.org.uk

Internet Matters

www.internetmatters.org

NSPCC Online Safety

www.nspcc.org.uk/keeping-children-safe/online-safety

Get Safe Online

www.getsafeonline.org

Cyber Choices – National Crime Agency

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

National Cyber Security Centre

www.ncsc.gov.uk

Mental Health and Emotional Wellbeing

Mind

www.mind.org.uk

MoodSpark

<https://moodspark.org.uk>

YoungMinds

www.youngminds.org.uk

Anna Freud Centre

www.annafreud.org

We Are With You

www.wearewithyou.org.uk

Radicalisation, Extremism and Hate Crime

Educate Against Hate

www.educateagainsthate.com

Counter Terrorism Internet Referral Unit

www.gov.uk/report-terrorism

True Vision – Hate Crime Reporting

www.report-it.org.uk

Children with Parents or Family Members in Prison

National Information Centre on Children of Offenders (NICCO)

www.nicco.org.uk

Appendix 3: Specific Safeguarding Issues

Elmley Dray School recognises that safeguarding concerns can present in many different ways and that some children and young people may be at increased risk of specific forms of harm. All staff are expected to understand the key safeguarding issues outlined below and to report concerns promptly to the Designated Safeguarding Lead (DSL).

Safeguarding concerns may overlap and should always be considered within the context of the individual child's circumstances. Children may experience harm from adults, other children, within families, communities or through online environments.

1. Online Safety, Nude and Semi-Nude Image Sharing and Sexual Extortion

Elmley Dray School recognises that children may be at risk of harm through online activity, including the sharing of nude or semi-nude images, online grooming, exploitation, coercion and sexual extortion.

Any incident involving an adult and nude or semi-nude images of a child will be treated as a serious safeguarding concern. Such incidents may constitute child sexual abuse and/or criminal offences and will be referred to the DSL immediately. The DSL will consider whether referral to children's social care and/or the police is required.

Adult-involved incidents may be:

Sexually motivated

An adult offender may:

- create a false identity online, including pretending to be another child;
- build trust through grooming;
- move conversations to private messaging or encrypted platforms;
- encourage or pressure a child to create and share sexual images;
- threaten to share images or use blackmail to obtain further images or sexual activity.

Financially motivated sexual extortion ("sextortion")

Offenders may:

- threaten to release images unless money or other benefits are provided;
- use hacked accounts or stolen images;
- use digitally manipulated or AI-generated images;
- pressure children to provide financial information or participate in criminal activity.

Possible indicators include:

- contact from unknown online accounts;
- sudden secretive online behaviour;
- movement from public platforms to private messaging;
- receiving gifts, money or online credits;
- pressure to share images;
- threats, blackmail or fear about images being shared.

All online safeguarding concerns will be managed in accordance with the school's Online Safety Policy and safeguarding procedures.

2. Children Absent from Education and Missing Children

A child being absent from education, particularly repeatedly or unexpectedly, may indicate safeguarding concerns including neglect, abuse, exploitation, mental health difficulties, substance misuse, forced marriage, FGM, radicalisation or criminal exploitation.

Children who may be at increased risk include those who:

- are vulnerable to harm or neglect;
- are missing from home or care;
- experience family instability;
- are involved with the youth justice system;
- are new to the UK or have recently arrived from overseas;
- are at risk of exploitation;
- are at risk of forced marriage or FGM.

Elmley Dray School follows its Attendance and Missing Child procedures to identify concerns, make appropriate enquiries and share information with relevant agencies where required.

Where a child leaves the school roll without a confirmed destination, the school will comply with statutory requirements regarding notification to the local authority.

3. Child Criminal Exploitation (CCE)

Child Criminal Exploitation occurs when an individual or group takes advantage of a child through coercion, manipulation, deception, violence or threats to involve them in criminal activity.

Exploitation may include:

- county lines activity;
- transporting drugs or money;
- working in cannabis cultivation;
- theft or shoplifting;
- carrying weapons;

- threatening or harming others.

Children can be exploited even where they appear to consent.

Indicators may include:

- unexplained gifts, money or possessions;
- changes in behaviour or emotional wellbeing;
- association with older individuals or groups;
- going missing or being absent from education;
- substance misuse;
- involvement with criminal networks.

Concerns will be reported to the DSL, who will consider referral to children's social care and/or the police.

4. Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of child sexual abuse where an individual or group takes advantage of a child through coercion, manipulation or deception for sexual purposes.

It may involve:

- exchanges for money, gifts, status or affection;
- online or face-to-face abuse;
- grooming and controlling relationships;
- sexual images or sexual activity.

Children may not recognise that they are being exploited and may believe they are in a relationship or friendship.

Indicators may include:

- relationships with significantly older individuals;
- unexplained gifts or money;
- changes in behaviour or friendships;
- missing education or going missing;
- sexual health concerns;
- emotional distress.

Concerns will be discussed with the DSL and managed through safeguarding procedures.

5. Child-on-Child Abuse

Elmley Dray School recognises that children can abuse other children. This may happen online or face-to-face and may occur between children of any age, gender or background.

Child-on-child abuse may include:

- bullying, including cyberbullying and discriminatory bullying;
- physical abuse;
- abuse within intimate relationships;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- sharing of nude or semi-nude images without consent;
- upskirting;
- initiation or hazing rituals.

The school maintains a zero-tolerance approach to sexual violence and sexual harassment. All concerns will be taken seriously, investigated appropriately and managed with consideration for the needs of both the child affected and the child displaying harmful behaviour.

Staff will recognise that children who display harmful sexual behaviour may also have experienced harm or trauma and may require support.

6. Domestic Abuse

Children can experience domestic abuse directly or indirectly by seeing, hearing or experiencing its effects.

Domestic abuse may include:

- physical abuse;
- emotional or psychological abuse;
- sexual abuse;
- financial abuse;
- controlling or coercive behaviour.

Domestic abuse can occur in any family or relationship and can affect children regardless of gender, age, ethnicity, disability, sexuality or background.

Exposure to domestic abuse can have a significant impact on a child's emotional wellbeing, development, behaviour and education.

Where appropriate, the school will respond to notifications received through safeguarding arrangements such as Operation Encompass (see appendix 4) and provide support according to the child's needs.

7. Homelessness

Homelessness or the risk of homelessness can significantly affect a child's welfare and may be linked to other safeguarding concerns.

The DSL will be aware of local referral pathways and will work with relevant agencies to support children and families.

Where a child is at risk of harm, a referral to children's social care will be considered.

8. Honour-Based Abuse, Female Genital Mutilation (FGM) and Forced Marriage

So-called honour-based abuse includes crimes committed to protect or defend perceived family or community honour. This may include FGM, forced marriage and other harmful practices.

All forms of honour-based abuse are abuse and will be treated as safeguarding concerns.

Female Genital Mutilation (FGM)

FGM is illegal and involves procedures that intentionally alter or injure female genital organs for non-medical reasons.

Possible indicators include:

- discussion of a special procedure or ceremony;
- extended travel to a country where FGM is practised;
- difficulty walking, sitting or using the toilet;
- repeated absence from school;
- emotional distress or withdrawal;
- disclosure by the child or family member.

If staff suspect FGM has taken place or a child is at risk, concerns must be reported immediately to the DSL.

Where a teacher discovers that FGM appears to have been carried out on a girl under 18, there is a mandatory duty to report to the police.

Forced Marriage

A forced marriage is one where one or both parties do not freely consent and where pressure, coercion or threats are used.

It is illegal to force a person into marriage or to cause a child under 18 to marry.

Indicators may include:

- concerns about travel overseas;
- family pressure regarding relationships;
- withdrawal from education or activities;
- fear of family members;
- discussion of a “special ceremony”.

Concerns must be reported to the DSL, who will follow safeguarding procedures and seek specialist advice where required.

9. Preventing Radicalisation

Elmley Dray School has a duty to protect children from the risk of radicalisation and involvement in terrorism.

Radicalisation is the process by which an individual comes to support terrorism or extremist ideologies.

Extremism involves the promotion of ideologies based on violence, hatred or intolerance that:

- deny the rights and freedoms of others;
- undermine democracy and democratic rights;
- create an environment where terrorism may develop.

There is no single indicator that a child is being radicalised. Possible indicators may include:

- increased isolation;
- changes in behaviour or friendships;
- expressing extremist views;
- accessing extremist material online;
- increased hostility towards others;
- secretive online activity.

Staff will report concerns to the DSL or Prevent lead. The school maintains appropriate filtering and monitoring arrangements and provides education to help children stay safe online.

10. Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment can occur:

- between children of any age or gender;
- online or offline;
- individually or as part of a group.

Sexual harassment may include:

- sexual comments or jokes;
- unwanted sexual attention;
- sharing sexual images;
- sexual rumours;
- online sexual harassment.

Victims will always be taken seriously, reassured and supported. They will never be made to feel responsible for reporting abuse or made to feel that they are causing a problem.

The school will:

- challenge inappropriate behaviour;
- maintain clear expectations around respect and consent;
- identify patterns of behaviour;
- review safeguarding practice where concerns arise.

11. Serious Violence

Staff will be alert to indicators that a child may be at risk from or involved in serious violence.

Indicators may include:

- unexplained injuries;
- changes in friendships;
- missing education;
- decline in wellbeing or achievement;
- unexplained gifts or possessions;
- links to criminal networks.

Concerns will be reported to the DSL.

12. Visitors and Site Security

All visitors must report to reception, confirm their identity, sign in and wear an identification badge while on site.

Visitors who are unknown to the school will have their identity and purpose for visiting checked before access is permitted.

Visitors attending for professional purposes will provide appropriate identification and confirmation of their organisation where required.

All visitors must follow safeguarding expectations. The school will not permit individuals to use premises to promote extremist views or place children at risk.

13. Non-Collection of Children

If a child is not collected at the expected time, the school will contact parents/carers and relevant transport providers where applicable.

The DSL or Deputy DSL will ensure that the child remains supervised by appropriate staff until safe collection arrangements are made.

14. Missing Children

Elmley Dray School has procedures to ensure that any missing child is located and returned to appropriate supervision as quickly as possible.

Where a child goes missing, staff must follow the Missing Child Policy immediately and inform the DSL or senior leader.

Appendix 4: Operation Encompass

Our school is part of Operation Encompass. Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse.

Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

There is a legislative requirement for police forces to share information with educational settings through Operation Encompass.

Through Operation Encompass the police will share information with our school about ALL police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information will occur PRIOR to the start of the next school day. The notification will inform us about the context of the incident and will include the Voice of the Child.

Once a Key Adult (DSL) and their deputy/ies (DDSLs) have completed the free National Online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other staff. All staff are encouraged to undertake the online training.

The DSL, DDSLs and our Safeguarding Governor, all undertook training.

Our parents are fully aware that we are an Operation Encompass school and we ensure that when a new child joins our school the parents/carers are informed about Operation Encompass.

We display the Operation Encompass posters.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The Key Adult /s have led training for all staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children.

As a school we have also discussed how we can support our children who are experiencing Domestic Abuse on a day-to-day basis and particularly following the Operation Encompass notification.

We have used the free Operation Encompass Handbooks to inform our thinking.

We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

The Safeguarding Governor will report on Operation Encompass to Governors. All information is anonymised for these reports.

When the Head Teacher & DSL or DDSLs leave the school and other staff are appointed, we will ensure that all Operation Encompass log in details are shared with the new Head Teacher /Key Adults and that the new member of staff will undertake the Operation Encompass online training.