Child Protection and Safeguarding Policy

Policy, Procedure and Guidance

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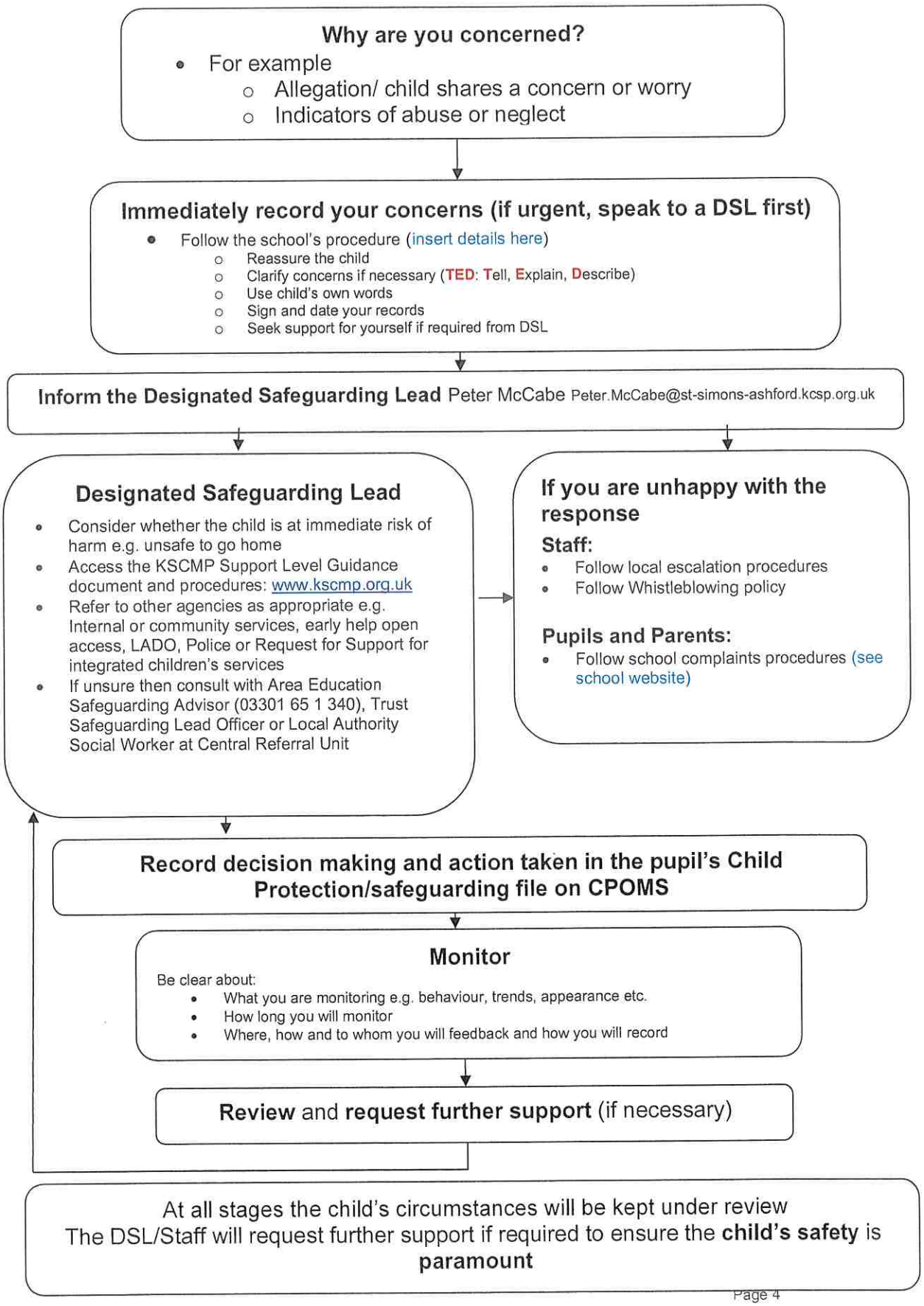
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1. Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:

- DfE guidance Keeping Children Safe in Education 2025 (KCSIE)
- Working Together to Safeguard Children 2023 (WTSC)
- Kent and Medway Safeguarding Children Procedures (online)
- Ofsted: Education Inspection Framework 2023, and the updated Ofsted Inspection Framework from autumn 2025
- Early Years and Foundation Stage Framework 2024 (EYFS)

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

This policy has due regard to the:

- Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty (PSED)

2. Contact details for other key personnel

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3. Aims of this policy

Kent Catholic Schools' Partnership ("the Trust") and each of its Schools is a community and all those directly connected (staff, governance committee members, directors, clergy, volunteers, families and pupils) have an essential role to play in making it safe and secure.

The Trust recognise the importance of providing a Catholic ethos and environment within the school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to.

The child's welfare is paramount, and the Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues.

4. Definition of safeguarding

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

5. Equality Statement

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

We give special consideration, where there are early help indicators, to children and young people including those who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 16).
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of honour-based abuse such as Female Genital Mutilation, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Have a parent or carer in custody, or is affected by parental offending
- Are looked after or previously looked after
- Are frequently missing/go missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Whose parent/carer has expressed an intention to remove them from school to be home educated. If the parent/carer of a child with an education, health and care (EHC) plan has expressed their intention to educate their child at home, local authorities will be involved to review the plan and work closely with parents/carers.

6. The Management of Safeguarding

Roles and Responsibilities

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

This policy applies to all staff, volunteers and governance committee members in the Trust and is consistent with the procedures of the three safeguarding partners: the local authority, local clinical commissioning group, and the Police. This Policy and procedures also apply to extended school and off-site activities.

All staff have a responsibility to:

- raise **any** concerns about children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm with the Designated Safeguarding Lead(s) or Deputy Designated Safeguarding Lead without delay. The DSL or Deputy DSL will take the appropriate action
- be aware that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected but staff should have a 'professional curiosity' and raise any concerns with the DSL
- provide a safe environment in which children can learn
- be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of the school environment
- be aware that multiple safeguarding issues often overlap with one another
- be aware that technology is a significant component in many safeguarding and well-being issues, and that online abuse often occurs alongside face-to-face abuse
- read and understand this Policy, the Trust Code of Conduct and part 1 and Annex B of the Department for Education's statutory safeguarding guidance 'Keeping Children Safe in Education', review this annually and sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Be aware of:
    - The Trust and School systems which support safeguarding, including this Child Protection & Safeguarding Policy, the Trust Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputy/deputies, the school behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
    - The Early Help process, the local offer 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
    - The process for making referrals to local authority children's social care and for statutory assessments that may follow as referral, including the role they might be expected to play
    - What to do if they identify a safeguarding issue or a child 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
    - The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child criminal exploitation (CCE), child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
    - The importance of reassuring victims that they are being take

The Lead Designated Safeguarding Lead (DSL) must be a member of the senior leadership team and have overall responsibility for the day-to-day oversight of safeguarding and child protection systems in the school.

The lead DSL role includes:

- being available during term time and school hours for staff to discuss any safeguarding concerns
- maintaining the "CPOMS" electronic system regarding individual children
- ensuring CPOMS records of all concerns, discussions and decisions, including the rationale for those decisions; this should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.
- recording on CPOMS instances where a child has a social worker, and use this information in the best interest of the child's safety, welfare and educational outcomes, such as when decisions are made on:
    - responding to unauthorised absence or unexplainable and/or persistent absences from education, where there are known safeguarding risks
    - the provision of pastoral and/or academic support
- regularly, at least annually, monitor and review the effectiveness of school filters and monitoring systems and escalate any concerns when identified
- making immediate and on-going assessments of potential risk
- putting in place and publicising an appropriate back-up accessibility protocol for times when the DSL/s are unavailable
- co-ordinating safeguarding action for individual children, including involving the SENCO in any concerns, suspected abuse or abuse involving children with SEND
- ensuring an understanding of the lawful basis for sharing information set out in Article 6 of the UK GDPR
- liaising and sharing information with other agencies and professionals
- ensuring that locally established procedures are followed and making referrals as necessary
- awareness of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence including:
    - communicating any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.
    - If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.
- representing or ensuring the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
- managing and monitoring the school's part in Early Help/Child in Need/ Child Protection plans
- help promote educational outcomes by:
    - sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff

    - Ensuring leadership and teaching staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort;
    - supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- ensuring that appropriate safeguarding and child protection training is delivered for all staff and volunteers and the contents of that training is updated regularly
- attending DSL training every two years, attending other training or information sessions held by or on behalf of the Trust and DSL Supervision managed via the Trust CPD Offer
- ensuring that all staff, volunteers and clergy associated with the school have read and are familiar with the appropriate level of safeguarding guidance
- responsibility for monitoring the safeguarding of pupils educated offsite
- consulting with the KCC Area Education Safeguarding Adviser to help with any decision making about a child. Advice may also be sought from KCC's Early Help Coordination Team or Specialist Children's Services (SCS) Duty Social Workers who offer opportunities for consultation as part of the Child in Need/Child Protection process.
- producing data and information for governance committee meetings including the annual report for to Governance committee and the Trust Lead Safeguarding Director/Officer regarding the monitoring and adherence to this Policy. Templates for the annual report can be requested from office@kcsp.org.uk

Deputy DSLs:

- being available during term time and school hours for staff to discuss any safeguarding concerns
- maintaining the "CPOMS" electronic system regarding individual children
- recording on CPOMS instances where a child has a social worker, and use this information in the best interest of the child's safety, welfare and educational outcomes, such as when decisions are made on:
    - responding to unauthorised absence or unexplainable and/or persistent absences from education there are known safeguarding risks
    - the provision of pastoral and/or academic support
- regularly monitor the effectiveness of school filters and monitoring systems and escalate any concerns when identified
- making immediate and on-going assessments of potential risk
- co-ordinating safeguarding action for individual children, including involving the SENCO in any concerns, suspected abuse or abuse involving children with SEND
- liaising with other agencies and professionals
- ensuring that locally established procedures are followed and making referrals as necessary
- awareness of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence including:
    - communicating any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded [state where, for example, on CPOMS].
    - If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with

PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

- undertaking DSL training every two years
- representing or ensuring the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
- managing and monitoring the school's part in Early Help/Child in Need/Child Protection plans
- help promote educational outcomes by
    - sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.
    - Ensuring leadership and teaching staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
    - supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- responsibility for monitoring the safeguarding of pupils educated offsite
- consulting with the KCC Area Education Safeguarding Adviser to help with any decision making about a child. Advice may also be sought from KCC's Early Help Coordination Team or Specialist Children's Services (SCS) Duty Social Workers who offer opportunities for consultation as part of the Child in Need/Child Protection process.

The Trust Lead Safeguarding Officer is responsible for:

- setting the Trust Safeguarding Strategy and Business Plan Objectives
- 1:1 line management of Directors of Education
- supporting Education Directors in the escalation of any concerns and providing advice & guidance as appropriate
- ensuring Trust safeguarding policies and procedures are updated annually or sooner when required
- ensuring there is appropriate funding for safeguarding
- ensuring safeguarding is accurately reported to the Trust Board
- ensuring a mechanism of safeguarding audit, internal and external, is in place
- managing allegations of abuse against senior staff following the advice of the LADO

The Trust Safeguarding & Wellbeing Manager is responsible for:

- liaising with Kent County Council, Medway council, The Front Door, Medway MASH teams to ensure the Trust DSLs and Deputy DSLs have access to all support available
- working with central team members and wider Trust team to ensure safeguarding compliance across the Trust
- ensuring system of annual reporting exists and to use termly DSL/Governance Committee Reports to monitor safeguarding activity within schools
- providing termly reports on behalf of the CEO to Trust Safeguarding Director and Trust Board and make any necessary recommendations
- meeting termly with the Trust Safeguarding Director to enable check and challenge
- ensuring quality of safeguarding training and support to schools
- support schools in the management of safeguarding systems and software management

The Trust Board will:

- facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- attend regular training that equips them with the knowledge to provide strategic challenge
- appoint a Board Director with responsibility for safeguarding
- evaluate the effectiveness of this Policy and regularly review and approve the Policy
- receive reports from the Trust Lead Safeguarding Director and the Trust Lead Safeguarding Officer regarding the impact of this policy and take decisions on any recommended actions.
- be aware of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the responsibilities to process personal information fairly and lawfully and to keep information held, safe and secure.

The Trust Lead Safeguarding Director:

- is appointed by the Trust Board
- attends Board/Education Standards Committee where safeguarding matters discussed
- meets termly with the Trust Safeguarding Officer; Trust Safeguarding & Wellbeing Manager and Director of Governance
- ensures reports and policies are presented to the Board/Committee for review
- supports the Board to understand safeguarding and child protection matters

The Directors of Education will:

- undertake 1:1 line management of Area School Improvement Partners
- review school improvement reports in relation to safeguarding and ensure plans for improvement are in place
- ensure staff welfare is monitored and a supervision provision for safeguarding leads is in place
- review school Annual Safeguarding Reports and commission any internal/external audits
- manage allegations of abuse against senior staff

The Area Schools Improvement Partner will:

- 1:1 Line management of Head Teacher
- ensure KCSIE compliance and effective child protection/safeguarding systems, processes and procedures are in place in schools through checking, monitoring and review
- ensure schools Safer Recruitment procedures are in place through SCR checking and monitoring
- ensure effective annual safeguarding training is in place
- ensure review and implementation of recommendations from internal or external audits or reviews

The Headteacher will:

- ensure KCSIE compliance and effective child protection/safeguarding systems, processes and procedures are in place in schools
- ensure schools Safer Recruitment procedures are in place including SCR management
- ensure a whole-school approach to:
    - safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
    - Preparing pupils for life in modern Britain and a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment underpinned by:
        - The school behaviour policy
        - a pastoral support system
        - a planned programme of RSHE delivered regularly to tackle issues age-appropriately such as: boundaries; consent; body confidence; stereotyping; and sexual harassment
- ensure that staff (including temporary staff and volunteers):
    - are informed of our systems which support safeguarding, including this policy, as part of their induction
    - understand and follow the procedures included in this policy, particularly those concerning referral of cases of suspected abuse, neglect and exploitation
    - undertake appropriate safeguarding and child protection training
- communicate this policy to parents/carers when their child joins the school and via the school website
- ensure that the DSL is properly supported in this role in respect of both dedicated time and resources to deliver the role effectively, and check that required actions have been taken
- ensure weekly DSL update meetings are conducted with SLT to discuss and review live cases
- ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family
- Ensure the academic progress and attainment of vulnerable children (those with a social worker) is maintained and that necessary support and adjustments are in place
- undertake Designated Safeguarding Lead training every two years
- ensure that this policy is implemented and interlinks with related policies
- ensure that locally agreed procedures are in place and being followed
- Regularly, at least annually, review and ensure the effectiveness of school filters and monitoring systems
- work to establish strong and co-operative relationships with relevant professionals in other agencies
- ensure the DSL provides an annual safeguarding report to the Local Governance Committee and the Trust Safeguarding Officer that includes details of safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained
- ensure that the Single Central Record is accurate and up to date by carrying out regular checks
- review and implement recommendations from internal or external reviews and audits.

The Lead Safeguarding Governance Committee Member will:

- liaise regularly with the DSL
- ensure that this policy is reviewed and noted by the governance committee

- support the governance committee to understand child protection and safeguarding issues
- ensure whole school annual safeguarding training takes place and is included in the induction process for new staff
- receive regular termly and annual reports from the DSL for the governance committee regarding the monitoring of and adherence to this Policy
- ensure that the school safer recruitment processes include the checking and monitoring of the SCR check, and review annually, that effective filtering and monitoring systems are in place
- attend regular training that equips them with the knowledge to provide strategic challenge
- monitor the implementation of recommendations from internal or external reviews or audits.

The **Governance Committee** will:

- support the facilitation of a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- appoint a governance committee member to be the safeguarding lead for the governance committee
- attend regular and Trust mandated training that equips them with the knowledge to provide strategic challenge
- review the implementation of recommendations from internal or external reviews or audits
- check that a review of filtering and monitoring systems used by the school has taken place regularly, and at least annually
- review the termly and annual safeguarding reports received.

7. Procedures

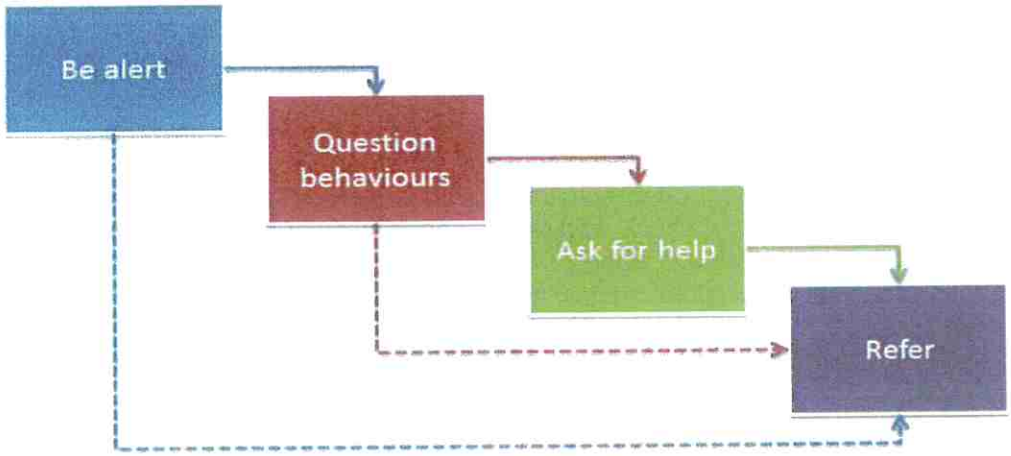
We adhere to the Kent Safeguarding Children Multi-Agency Partnership arrangements (KSCMP). The full KSCMP procedures document and additional guidance relating to specific safeguarding issues can be found on their website www.kscmp.org.uk

Where a child lives outside of Kent, the school will follow the procedures for that area's Multi-agency Partnership arrangements.

Additional guidance for staff includes:

- 'What to do if you are Worried About a Child Being Abused' (DfE 2015)
- Information Sharing advice for safeguarding practitioners (2018)
- Kent and Medway Inter-Agency Threshold Criteria for Children in Need
- The Assessment Framework for Children in Need and their Families (2000)

'What to do if you are worried about a child being abused' (DfE 2015) identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect. All staff members are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

- The DSL may seek advice or guidance from the Area Safeguarding Advisor from the KCC Education Safeguarding Service before making a decision regarding next steps. They may also seek advice or guidance from a social worker at the Front Door Service or the Trust Lead Safeguarding Officer.
- All members of staff are made aware of the internal and local early help support services. Where a child is being offered or receiving early help support, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the Front Door if the situation does not appear to be improving or is getting worse.
- All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- **In all but the most exceptional circumstances, parents/carers will be made aware of the concerns for their child at the earliest possible stage.** 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 in line with guidance provided by the KSCMP, unless there is a valid reason not to do so, for example if to do so would put a child at risk of harm or would undermine a criminal investigation.
- In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL.
- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider re-referral. Professional disagreements (escalation) will be responded to in line with the KSCMP procedures and DSLs may request support via the Education Safeguarding Service.

What to do in the absence of the school's DSL or Deputy DSL
In the absence of the availability of the school's own DSL to discuss an immediate and urgent concern, staff can seek advice from the Headteacher, the KCC Education

Safeguarding Service or via consultation with a social worker from the Front Door. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.

What to do if you remain concerned about a child

On occasion, a member of staff, clergy or volunteer may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff or volunteers should feel able to clarify with the DSL further progress, so that they can reassure themselves the child is safe, and their welfare is being considered. If in following this process, the staff member or volunteer remains concerned that appropriate action is not being taken, it is the responsibility of that staff member or volunteer to seek further direct consultation from either a member of the Education Safeguarding Service who will be able to discuss the concern and advise on appropriate action to be taken or the Trust Lead Safeguarding Officer.

8. Children who are absent from education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school and where there are unexplainable and/or persistent absences from education can be an indicator of abuse, neglect and exploitation and may also raise concerns about other safeguarding issues. We follow the government's statutory guidance 'Working together to improve school attendance'. We monitor attendance carefully and address poor or irregular attendance without delay as set out in the attendance policy which can be found on the school website.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
    - Leave the school to be home educated
    - Move away from the school's location
    - Remain medically unfit beyond compulsory school age
    - Are in custody for four months or more (and will not return to school afterwards): or
    - Are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

We will inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for more than 10 days.

Alternative provision settings

Where we place a pupil with an alternative provision provider, we understand that the school remains responsible for the safeguarding of pupils during school hours, ensuring the placement meets the pupil's needs. We will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform, and request written confirmation that the alternative provider will inform the Headteacher (or their delegate) of any arrangements that may put the child at risk (i.e. staff changes), to ensure that appropriate safeguarding checks have been carried out on any new staff.

The Headteacher will ensure that the addresses of any alternative provider and any subcontracted provision or satellite sites the child may attend are recorded on CPOMS. The Headteacher will also ensure that any alternative provision is reviewed at least every half term to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

9. Private Fostering

Parents and carers often fail to notify schools about private fostering arrangements even though they are legally required to notify the local authority. Often this is because they are unaware of the requirements, or they believe that this is a private family arrangement which does not concern anybody else. This lack of awareness means that many privately fostered children remain hidden and can be vulnerable.

What is private fostering?

Private fostering occurs when a child under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a close family relative for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins. Private fostering is a private arrangement made by the parent(s), (or those with parental responsibility) for someone to care for their child because they are unable to do so (permanently or temporarily). This may be due to parental ill health, a parent going abroad or into prison, a child being brought to the UK to study English or the relationship between the child and parent has broken down.

School staff play an essential role in identifying privately fostered children. If you know a child is being privately fostered, you should tell the parent/carer that they must report the arrangement to Kent County Council at least six weeks before it happens or within 48 hours if the arrangement is current having been made in an emergency.

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

10. Induction and training

All staff

All staff and volunteers (including governance committee members, directors and clergy) will be given an appropriate level of safeguarding training. Training will be integrated, aligned

and considered as part of the whole-school safeguarding approach and wider staff-training, and curriculum planning.

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

- This child protection and safeguarding policy
- School behaviour policy
- Physical Intervention or Positive Handling policy
- Online safety
- staff code of conduct
- the safeguarding response to children who are absent from school; and
- Part One of KCSIE 2025 and Annex B for school leaders and all members of staff who work directly with children and young people
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies) see KCSIE 2025
- training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being involved with or supporting terrorism and to challenge extremist ideas.

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

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

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

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

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

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

The Trust Safeguarding Director and Governance Committee Safeguarding Lead will:
receive safeguarding training upon commencement of their role and then on an annual basis. The Training is available via The Key and must be accessed by individuals themselves

Trust Directors and Governance Committee members

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

11. Record keeping

Staff, volunteers and clergy must record any welfare concern that they have about a child or young person on the CPOMS (Child Protection Online Management of Safeguarding) online system. Where clergy or volunteers do not have access to the CPOMS system, concerns can be recorded on a referral form which can be found in school office and in the photocopy room. For concerns not logged on CPOMS, the DSL should be informed that a concern has been raised by speaking directly to the DSL or Deputy DSL or via school office staff who will record and alert the DSL or Deputy DSL. Records must be completed as soon as possible after the incident/event and must be signed and dated. Any verbal conversations should be promptly recorded in writing in DSL/Deputy DSL journal.

The DSL will keep written records of all concerns, discussions and decisions, including the rationale for those decisions; this should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

Safeguarding records are kept separate from all other records relating to the child or young person in the school. They are retained centrally and securely by the DSL and are shared on a 'need to know' basis only. The DSL will ensure that the record keeping processes adhere to the Trust Records Management policy and the Data Protection Act 2018. In the case of concerns recorded on CPOMS, these are stored electronically and accessible via passwords by the DSLs only.

The Headteacher will be kept informed of any significant issues by the DSL.

Detailed guidance on Record Keeping is found in a separate document "**Guidelines for Recording Keeping**" – Staff, volunteers and clergy MUST familiarise themselves with the responsibilities outlined in this document.

All safeguarding records will be forwarded to a child's subsequent school under confidential and separate cover to the new DSL or Headteacher within 5 days for an in-year transfer or within the first 5 days of a new term.

The Trust recruitment policy, Trust Records Management Policy and Trust Single Central Record and Safer Recruitment Procedures set out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.

Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

12. Concerns (including low-level concerns) about a staff member, supply teacher, volunteer or contractor

For specific guidance on how to respond to concerns or allegations against staff (including those not directly employed by the Trust) or volunteers, please refer to the Appendix 2 which sets out the Trust's **Procedures for Managing Safeguarding Concerns and Allegations made about staff, including supply teachers, other staff, volunteers and contractors.** These procedures apply to all cases in which it is alleged that a current member of staff (or supply teacher, volunteer or contractor) has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or

- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. For example, where a member of staff is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children.

We recognise that it is possible for staff, supply teachers, volunteers or contractors to behave in a way that might cause harm to children and take seriously any allegation received.

Any such concerns or allegations should be referred immediately to the Headteacher who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member (including supply teachers, volunteers or contractors), and notify the Trust Safeguarding Lead Officer.

If there are any concerns about the Headteacher, Area School Improvement Partners or members of the Trust Executive team these should be referred immediately to the Trust Chief Executive Officer who will contact the Local Authority Designated Officer (LADO).

Where there are concerns about the Chief Executive Officer, members of the Trust Board of Directors or School Governance Committee Members, these should be referred immediately to the Trust Company Secretary who will contact the Local Authority Designated Officer (LADO) without delay.

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

Where there is a belief that there is, or maybe, a conflict of interest in reporting a concern or an allegation about a member of staff (including a supply teacher, volunteer or contractor) to the member of Trust staff outlined above, report it directly to the Local Authority Designated Officer (LADO).

Appendix 2 also sets out the Trust's procedures for dealing with low-level concerns.

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

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

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

All staff and volunteers need to be aware of the Trust Whistleblowing Policy and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. A copy of the Trust's Whistleblowing Policy is in all Safeguarding files and on the school's website. The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 8005000.

13. Managing allegations of abuse against other pupils

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to:

- Bullying (including cyberbullying)
- Online abuse which often occurs alongside face-to face abuse
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Abuse in intimate relationships between peers
- Sexual violence and sexual harassment;
- Gender-based violence
- Discriminatory behaviour
- Upskirting - where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.
- Sharing of nudes and semi-nudes, including computer-generated imagery (also known as sexting and youth produced imagery) (see section 14 for detailed guidance on this); and
- Initiation-type violence and rituals.

Abuse is abuse and will never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

The Trust considers that all children should have a right to attend school and learn in a safe environment. Children should always be free from harm by adults and other children in and outside the school. The Trust recognises that some pupils will sometimes negatively affect the learning and well-being of others and their behaviour will be dealt with under the school's Behaviour Policy.

Safeguarding allegations

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found. The allegation:

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this pupil
- Indicates that young people outside the school may be affected by this pupil

Examples of safeguarding issues against a pupil could include:

Physical Abuse

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

Emotional Abuse

- Blackmail or extortion
- Threats and intimidation

Sexual Abuse

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in the sharing of nudes and semi-nudes

Sexual Exploitation

- Encouraging other children to attend inappropriate parties
- Photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older pupils may attempt to recruit younger pupils using any or all the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Creating a supportive environment in school and minimising the risk of safeguarding concerns towards pupils from other pupils

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

To achieve this, the school will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child 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 child'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:
        - Children 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 child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns

What to do

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed immediately.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact the local authority's designated officer (LADO) (or its equivalent if more than one local authority is implicated) to discuss the case and it may be that Children's Social Care are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome, and keep a copy in both pupils' files. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim). The DSL must also inform KCSP's Designated Lead Officer (identified at the beginning of this Policy) immediately. It may be appropriate to exclude the pupil being complained about for a period according to the school's Behaviour Policy and procedures.

Where neither the LADO or the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be undertaken along with an appropriate plan to ensure safety, taking into account as appropriate any pertinent individual differences of an alleged victim or alleged perpetrator.

The plan should be monitored, and a date set for review with everyone concerned.

14. Sharing of nudes and semi-nudes (sexting)

In cases of sharing of nudes and semi-nudes we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) "Sharing of nudes and semi-nudes: advice for education settings working with children and young people"

Responsibilities for all staff 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 (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil 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 pupil to delete it
- Ask the pupil(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 pupil(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 pupil(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 pupil(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 pupils 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 pupils 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
- 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 special educational needs)
- 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 pupil in the images or videos is under 13
- The DSL has reason to believe a pupil 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 the Headteacher and 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 pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil 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 pupil at risk of harm.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our [relationships education / relationships and sex education – and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- 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
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images]

15. Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- All pupils will be encouraged to report any abuse to their class teacher or the DSL/Deputy DSL
- Pupils are made aware/taught how to report/raise concerns via our PSHE scheme of work "Life to the Full"
- The school has developed with the pupils "pupil friendly" policies with regards to safeguarding so children are fully aware of how to report any concerns
- The school has a very open culture where pupils feel safe in raising any concerns and know that their concern will be taken seriously

16. Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Staff should be aware that where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If a member of staff has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the designated safeguarding lead or a deputy. DSLs will work with mental health leads where safeguarding concerns are linked to mental health.

17. Sexual violence and sexual harassment between children

For the purposes of this policy, **sexual violence** between children refers to sexual offences under the Sexual Offences Act 2003 and includes: rape, assault by penetration, sexual assault. **Sexual harassment** between children refers to unwanted conduct of a sexual nature that can occur online and offline and can include: sexual comments, sexual "jokes" or taunting, physical behaviours (such as deliberately brushing against someone).

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. KCSP Schools will challenge sexual harassment to ensure that these inappropriate behaviours are not normalised and provide an environment that may lead to sexual violence.

If any member of staff has any concern that a child is the victim or at risk of becoming a victim of sexual violence or sexual harassment between children, they **must** follow the guidance from the "Managing allegations against other pupils" section above.

Trust Schools must ensure that evidence-based content is delivered through the curriculum that is developed to be age and stage of development appropriate that tackles issues such

as: healthy and respectful relationships; what respectful behaviour looks like; gender roles; stereotyping; prejudiced behaviour; and addressing cultures of sexual harassment.

18. Safeguarding children with SEN, Disabilities or health conditions

The Trust acknowledges that additional barriers and safeguarding challenges can exist when recognising abuse, neglect and exploitation in children with Special Educational Needs (SEN), disabilities or health conditions, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers, cognitive understanding and difficulties in managing or reporting these challenges.

The Trust will ensure that children with SEN, disabilities and health conditions, including those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with SEN, disabilities and health conditions can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN, disabilities and health conditions may not always outwardly display indicators of abuse.

At this school we identify pupils who might need more support to be kept safe or to keep themselves save by: Regularly monitoring pupils and through regular pupil check in with a designated adult/s.

19. Children who are LGBTQ+ or gender questioning

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ or are gender questioning, can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ or are gender questioning, lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider

vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

20. Working with other agencies

The Trust recognise and are committed to our responsibility to work with other professionals and agencies both to ensure children and young people's needs are met and to protect them from harm. The Trust endeavours to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

The Trust is not the investigating agency when there are child protection concerns and the Trust will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise a crucial part of this may be in supporting the child while these take place.

21. Confidentiality and information sharing

The Trust recognises that all matters relating to child protection are confidential. The Headteacher or DSL will only disclose any information about a pupil to other members of staff on a need-to-know basis.

Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these. In order to protect confidentiality, safeguarding information about individual children is shared on a need-to-know basis only and thus, what may seem to be a minor issue to one staff member or volunteer, may be highly significant to a bigger picture of risk.

All staff, volunteers and clergy must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on dealing with disclosures can be found in the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE 2024).

The Data Protection Act 2018 and GDPR does not prevent the sharing of information for the purposes of keeping children safe and fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children.

Where the serious harm test under the legislation is met, staff must not provide pupils' personal data. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, the school must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek advice from the Trust Safeguarding Lead Officer.

Where a child leaves the School, the DSL should ensure that their child protection file is transferred to the new school as soon as possible, securely, and confirmation of receipt should be obtained. This should be transferred separately from the main pupil file.

22. Curriculum and staying safe

Pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

We regularly hold assemblies on how to keep safe with various outside agencies such as Kent Fire Brigade, NSPCC and follow programs such as the NSPCC "Talking Pants". We participate in curriculum or themed weeks such as Friendship Week or Internet Safety Week in which we further embed and enhance learning on safeguarding. The school also use the Ten Ten Scheme of Work "Life to the Full" which covers key aspects of how to keep safe

The Trust will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social, emotional, psychological and spiritual understanding, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

Systems have been established to support the empowerment of children and young people to talk to a range of staff, volunteers and clergy. Pupils will be listened to and heard, and their concerns will be taken seriously and acted upon promptly and appropriately.

23. Online safety and mobile technology

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

To address this, our schools aim to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governance committee members
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of Generative Artificial Intelligence (AI) as set out in the Trust's Use of AI policy
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Ensure that all staff receive training at induction, regularly updated, on online safety which will include an understanding of the expectations, applicable roles and responsibilities in relation the filtering and monitoring. This training will be in line with any advice from the safeguarding partners. The Trust approach to online safety is based on the addressing the following categories of risk:

- **content:** being exposed to illegal, inappropriate or harmful material, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

- **contact:** being subjected to harmful online interaction with other users being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.
The DSL and leadership team within the school must read Part One, paragraphs 134 – 151 regarding Online Safety within 'Keeping children safe in education' 2025 and confirm or adjust school policy and practice accordingly.

Our approach to online safety will be in line with government guidance "Meeting digital and technology standards in schools and colleges"

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Share information with parents/carers about:
  - what systems the school have in place to filter and monitor online use
  - what the school is asking pupils to do online, including the sites they are asked to access
  - who from the school (if anyone) their child is going to be interacting with online
- We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place, and review annually, robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on the school website https://st-simons-roman-catholic-primary-school.secure-primarysite.net/policies/

24. Supervision and support

Any member of staff, volunteer and the clergy affected by issues arising from concerns for children's welfare or safety can seek support from the DSL, Headteacher or, if necessary, the Trust Lead Safeguarding Officer who will seek advice as appropriate.

All newly qualified teachers, classroom assistants and volunteers receive induction training and have a mentor or co-ordinator with whom they can discuss concerns including the area of child protection.

The DSL can put staff, clergy, volunteers, and parents and carers in touch with outside agencies for professional support if they so wish.

All Lead DSLs in Trust schools take part in Supervision run by Educational Psychologists.

25. Safe working practice

Staff are required to work within clear guidelines on safe working practice as set out in the Trust's Staff Code of Conduct.

Children and young people may make allegations against staff or volunteers in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all school staff, volunteers and clergy should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents/carers to be conducted in view of other adults.

Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff, volunteers and clergy should be aware of the school's Behaviour and Physical Intervention Policies and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided. Further guidance can be found in 'Searching, Screening and Confiscation' (2018).

Full advice and guidance can be found in Guidance for Safer Working Practice for Adults who Work with Children and Young People (2022).

Staff, volunteers and clergy should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in **Guidance for Safer Working Practice for Adults who Work with Children and Young People**, the Trust Code of Conduct, the school's **Online Safety Policy** and **Acceptable Use Policy** and the **Kent Safeguarding Children's Board document : Safer Practice with Technology – Guidance for Adults who Work with Children and Young People.**

26. Complaints

The Trust has a **Complaints Policy** available to parents/carers, pupils/students, staff, volunteers and clergy who wish to report concerns. This can be found on the school and Trust website.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation of abuse against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations of Abuse Against Staff (Appendix 2).**

27. Safer recruitment

The Trust is committed to ensure that all steps are taken to recruit staff, volunteers and clergy who are safe to work with our pupils/students and have their welfare and protection as the highest priority. The Trust and the School Leadership Team are responsible for ensuring that the school follows safer recruitment processes outlined within guidance, including accurate maintenance of the Single Central Record; and an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role.

The Trust Recruitment Policy and Trust Single Central Record and Safer Recruitment Procedures provide further detail on safer recruitment requirements.

The Headteacher will ensure that any senior staff responsible for recruitment complete accredited Safer Recruitment Training in line with government requirements. The Trust Safeguarding Lead Officer will ensure that Headteachers and relevant senior members of the Trust central team who are responsible for recruitment complete accredited Safer Recruitment training in line with government requirements.

PLEASE NOTE: THE FOLLOWING PARAGRAPH IS RELEVANT ONLY IN SCHOOLS WHERE TEACHERS FALL INTO THE REGULATIONS – FOR EXAMPLE OFFER CHILDCARE TO UNDER 5s OR EXTENDED ACTIVITIES TO UNDER 8s.

We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools. We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands and warnings.

28. The use of school premises by other organisations

Where contracted services or activities are provided separately by another body using the school premises, the Headteacher and Governance committee , where relevant, will ensure that these bodies have appropriate policies and procedures in place with regard to

safeguarding children and young people, and child protection, and that relevant safeguarding checks have been made in respect of staff, volunteers and clergy and that there are arrangements in place to link with the school on such matters.

Evidence of relevant safeguarding checks being in place will be sought by the school's DSL before agreeing the use of school premises. The Trust Model Lettings Policy and Agreement must be in place prior to the commencement of any lettings arrangement. If assurance is not achieved, an application to use the premises will be refused.

If the school or Trust receives an allegation relating to an incident where an individual or organization was using the school premises for running an activity for children, we will follow this safeguarding policy and our procedures for managing allegations and will inform the LADO, as would be the case with any safeguarding allegation.

29. Checking the identity and suitability of visitors, including visiting speakers

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge. Further information can be found in the Trust's Protocols for visiting speakers that can be found on the Trust website.

All visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and the Trust's procedures will be followed which include a risk assessment and visitor confirmation form prior to any event taking place – this can be found on the Trust's website. This is to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

30. Security

All staff, volunteers and clergy have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Appropriate checks will be undertaken in respect of visitors and volunteers coming into the school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

All schools have plans in place to respond effectively to different types of incidents. If an incident does arise, staff should be able to draw on their knowledge from existing plans and make good, informed judgements about how to keep themselves and others safe.

The school will not accept the behaviour of any individual (parent/carer or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

31. Arrangements for review, monitoring and evaluation

All policies related to safeguarding will be reviewed, in line with Trust model policies, by the Governance committee which has responsibility for oversight of school safeguarding and child protection systems. The Headteacher will ensure regular reporting by the Designated Safeguarding Lead on safeguarding activity and systems in the school to the Governance committee. The Governance committee will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Trust Safeguarding Officer and Governance committee with consequent action.

In addition, the school's Designated Safeguarding Lead, in conjunction with the Governance Committee Safeguarding Lead, will monitor the operation of this policy and its procedures and will make termly briefings and an annual report to the Governance committee. Termly governance reports and copies of the annual report will be copied to the Safeguarding Lead Director. The template for annual reporting can be requested from office@kcsp.org.uk

Related safeguarding information, policies and procedures

32. Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

When deciding whether to involve the police and/or children's social care, DSL's will need to consider whether a child is at risk of harm and a subsequent referral is appropriate. Consideration should be given to whether or not there are any concerns about the young person's vulnerability including SEND, whether any pressure or coercion was applied, what ages are involved and to what extent were images shared. Further information and guidance should be sought from UK Council for Internet Safety: Sharing nudes and semi nudes: advice for education settings working with children and young people.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts

- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

33. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are a form of child abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into criminal or sexual activity which may be (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. It can involve force and/or enticement-based methods of compliance and can involve violence or threats of violence. The victim may have been exploited even if the activity is consensual. CCE and CSE does not always involve physical contact; it can be facilitated and/or take place online. It can be perpetrated by individuals or groups, males or females, and children or adults. It can be a one-off occurrence or be a series of incidents over time and range from opportunistic to complex organised crime.

Indicators of child exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of the internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being
- Go missing from school or home and are subsequently found in areas away from their own
- Have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of CCE and CSE, it must be remembered that not all children with these indicators will be exploited. CCE or CSE can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;

- Absence of a safe environment to explore sexuality;
- Economic vulnerability
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

34. 'County Lines' – a form of Child Criminal Exploitation

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism[1] should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

35. The 'Prevent Duty'

Note: This preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024.

Preventing Radicalisation under The Counterterrorism and Security Act: Identifying cases of pupils at risk of involvement in extremist behavior

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a

[1] National Crime Agency - Modern slavery and human-trafficking

schools or colleges safeguarding approach

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Where staff are concerned that children and young people are developing extremist views or show signs of being radicalised, they should discuss this with the Designated Safeguarding Lead who is able to support staff with any concerns they may have and may make a Prevent referral.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism
Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being involved with or supporting terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which
will discuss the individual referred to determine whether they are susceptible to being involved with or supporting terrorism and consider the appropriate support required. A representative from

the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

36. 'Honour-Based' Abuse

The Trust are aware that Honour-based Abuse encompasses a range of crimes committed under a perverse view within sections of communities that they protect or defend the honour of the family and/or the community. These crimes include: female genital mutilation (FGM), forced marriage (FM), and practices such as breast ironing (BI).

The indicators of Honour-Based Abuse and associated factors should be covered with staff, governance committee members and other volunteers within the school safeguarding training. All members of staff, governance committee members and other volunteers must be alert to the possibility of a child being at risk of Honour-based abuse, or already having suffered. They must also be aware that all forms of Honour-based abuse are abuse (regardless of the motivation) and must be handled and escalated as such. Staff must speak with the DSL if they are at all concerned about Honour-based abuse.

All members of staff, governance committee members and other volunteers must follow the school and Trust procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

37. Female Genital Mutilation (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 child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly and unexplainably absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Possible indicators that a pupil may be at risk of FGM, are:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly and/or unexplainably absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl'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 children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil 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 pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

38. Forced Marriage (FM)

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. Staff, governance committee members and other

volunteers should report concerns regarding FM, including non-binding, unofficial 'marriages' to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk

39. Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness, by seeing or hearingand be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass

Operation Encompass operates in the majority of police forces across England, including within Kent. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

40. Child Abduction & Community Safety Incidents

Child abduction is defined as the unauthorised removal or retention of a minor from a parent or carer. It can be committed by parents or other family members, people known but not related to the victim (e.g. neighbours, friends and acquaintances), and by strangers

Staff should also be aware of other community safety incidents in the vicinity of the school such as people loitering near the school and unknown adults talking to children.

The school will ensure that children get practical advice on keeping themselves safe, focusing on building their confidence and abilities rather than simply warning them about all strangers.

41. Further information, policies and procedures

There are a large number of related safeguarding information/policies that the DSL/s, school leadership team and governance committee safeguarding lead are aware of and to which it will ensure that staff, volunteers and clergy have due regard, as appropriate, alongside this policy:

KCSP Policies and Procedures

- Child missing from education
- Child missing from home or care

- Health and Safety Policy
- Whistleblowing Policy
- Code of Conduct for Staff

Policies and guidance documents for Schools

- Online safety policy
- Use of AI policy
- Behaviour policy
- Physical Intervention Policy
- Guidelines for the use of physical intervention
- Fabricated or induced illness
- School drug policy
- Bullying including cyber bullying/Anti-Bullying Procedure
- First Aid and Accident Policies
- Procedures for Assessing Risk (re school trips)
- Intimate care guidance

Copies of the above documents are available to access via the school website.

42. Guidance

Recognition and categories of abuse

All staff, volunteers and clergy in the school should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to Part 1 of 'Keeping Children Safe In Education' and 'What to do if you are worried a child is being abused'.

Staff, volunteers and clergy need to remember that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, including, via the internet. In the case of female genital mutilation (FGM), children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse, neglect and exploitation can happen over a period but can also be a one-off event. Child abuse, neglect and exploitation can have major long-term impacts on all aspects of a child's health, development and well-being.

The warning signs and symptoms of child abuse, neglect and exploitation can vary from child to child. Disabled children and young people may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. Children and young people also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be

alert to parent-child interactions which are concerning and other 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. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

43. Details of National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Pupils

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Catholic Children's Society www.cathchild.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- NSPCC – Safeguarding children with special educational needs and disabilities (SEND) and NSPCC – Safeguarding child protection/deaf and disabled children and young people

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour Based Abuse

- Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage

Sexual Abuse and Child Sexual Exploitation (CSE)

- Lucy Faithfull Foundation's 'Shore Space', an online resource including a confidential chat service

- Lucy Faithfull Foundation's Harmful Sexual Behaviour toolkit
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentsinfo.org
- Internet Matters: www.internetmater.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation and Hate Crime

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk
- Prevent: www.gov.uk/government/publications/prevent-duty-guidance

44. Appendix 1 – Types of abuse

All Trust staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

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

Exploitation: a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

45. Appendix 2 – procedures for managing safeguarding concerns and allegations about staff, including supply teachers, volunteers and contractors

Section 1: allegations that may meet the harms threshold

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

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

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegations of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

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

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

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

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is a reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will

only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

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

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

Definitions for outcomes of allegation investigations

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

Procedures for dealing with allegations

In the event of an allegation that meets the criteria above, the 'case manager' will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the local authority designated officer (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the Police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the Police).
- Inform the Trust Safeguarding Lead Officer.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the Police or children's social care services, where necessary). Where the Police and/or children's social

care services are involved, the case manager will only share information with the individual that has been agreed with those agencies.

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with the children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, Police and/or children's social care services, the Trust Lead Safeguarding Officer, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If immediate suspension is considered necessary**, the case manager will agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school/Trust and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in the school/Trust and/or liaise with the Police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. All staff have access to the Employee Assistance Programme through the Education Support Partnership.
- Inform the parents/carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or Police, if applicable). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents/carers of the child/children involved informed of the progress of the case and seek advice from the LADO regarding what information can be disclosed to the parents/carers (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- **If an allegation is made against a member of the clergy** or a member of a religious order, linked to an educational establishment, the Diocesan Safeguarding Officer must also be notified who will take a lead role for the Diocese in any investigation.

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

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

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

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

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

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

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

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

Individuals returning to work after suspension

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared

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

Record Keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

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

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

Record keeping

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

Records will be:

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

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

References

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

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

Low-level concerns about supply staff and contractors

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