



# **The Golden Thread Alliance Safeguarding and Child Protection Policy**

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

Date written: September 2022 – UPDATED February 2023

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

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# WHAT TO DO IF YOU HAVE A WELFARE CONCERN

## Why are you concerned?

- For example
- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change

## Immediately record your concerns (if urgent, speak to a DSL first)

Follow the school's procedure (**R**ecognise, **R**ecord, **R**e-refer)

- Reassure the child
- Clarify concerns if necessary (**T**ED: **T**ell, **E**xplain, **D**escribe)
- Use child's own words
- Ensure that your record is detailed
- Seek support for yourself from a DSL

Your school DSLs are listed in the Safeguarding Policy and on posters around the school.

## Designated Safeguarding Lead

Consider whether the child is at immediate risk of harm e.g. unsafe to go home

Access the Kent Safeguarding Support Level Guidance document and procedures: [www.kscmp.org.uk](http://www.kscmp.org.uk)

Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services

## If you are unhappy with the response

### Staff:

Follow local escalation procedures (Kent Escalation and Professional Challenge Policy)  
Follow Whistleblowing procedures

### Pupils and Parents:

Follow school complaints procedures.  
Contact Headteacher, Executive Headteacher, Chair of Trustees.

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

## Monitor

Be clear about:

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

Review and request further support (if necessary)

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

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

# 1. CHILD FOCUSED APPROACH TO SAFEGUARDING

## 1.1 Introduction

- The Golden Thread Alliance recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and pupils) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- The Golden Thread Alliance believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at The Golden Thread Alliance will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- The Golden Thread Alliance recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
  - Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - Protection: following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - Support: for all pupils, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
  - Collaborating with parents and other agencies: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' (KCSIE) 2022.

## 1.2 Policy context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2022 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
  - Keeping Children Safe in Education 2022 (KCSIE)
  - Working Together to Safeguard Children 2018 (WTSC)
  - Ofsted: Education Inspection Framework'
  - Framework for the Assessment of Children in Need and their Families 2000 Kent and Medway Safeguarding Children Procedures
  - Early Years and Foundation Stage Framework 2021 (EYFS)
  - The Education Act 2002
  - Education and Inspections Act 2006 Not relevant to all settings so remove if not applicable.
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - The Human Rights Act 1998
  - The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- The Golden Thread Alliance will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary.
- The Golden Thread Alliance recognises that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

### **1.3 Definition of safeguarding**

- In line with KCSIE 2022, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - protecting children from maltreatment
  - 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, and
  - taking action to enable all children to have the best outcomes.



- The Golden Thread Alliance acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Child-on-child abuse
  - Children with family members in prison
  - Children Missing Education (CME)
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Contextual safeguarding (risks outside the family home)
  - County lines and gangs
  - Domestic abuse
  - Drugs and alcohol misuse
  - Fabricated or induced illness
  - Faith abuse
  - Gender based abuse and violence against women and girls
  - Hate
  - Homelessness
  - Human trafficking and modern slavery
  - Mental health
  - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
  - Online safety
  - Preventing radicalisation and extremism
  - Private fostering
  - Relationship abuse
  - Serious violence
  - Sexual violence and sexual harassment
  - So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
  - ‘Upskirting’

(Also see Part One and Annex B within ‘Keeping Children Safe in Education’ 2022)

## **1.4 Related safeguarding policies**

- This policy is one of a series in The Golden Thread Alliance integrated safeguarding portfolio and should be read and actioned in conjunction with the procedures, strategies and policies as listed below:
  - Behaviour, including behaviour management and use of physical intervention  
Note: we recommend Headteachers access the updated DfE 'Behaviour in Schools Advice for Headteachers and school staff' guidance.
  - Staff/Pupil Code of conduct/Behaviour policy
  - Searching, screening and confiscation (if not addressed in the behaviour policy)
  - Online safety
  - Social media
  - Mobile and smart technology
  - Anti-bullying strategy
  - Data protection and information sharing
  - Image use
  - Relationship, Sex and Health Education (RSHE)
  - Personal and intimate care procedures
  - Health and safety, including plans for school reopening
  - Attendance
  - Risk assessments, such as school trips, use of technology, school re-opening
  - First aid and accidents
  - Managing allegations against staff
  - Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
  - Safer recruitment
  - Whistleblowing

## **1.5 Policy compliance, monitoring and review**

- The Golden Thread Alliance will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2022 via our online Safeguarding system, MyConcern. These policies are also available on our school websites.
- Parents/carers can obtain a copy of the Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the Trust and individual school websites:

- The Golden Thread Alliance
- Culverstone Green Primary Academy
- Fleetdown Primary Academy
- Meopham Community Academy
- Oakfield Primary Academy
- Riverview Infant School
- Riverview Junior School
- Temple Hill Primary Academy
- West Hill Primary Academy
- Wrotham Road Primary School

- The policy forms part of our school development plan and will be reviewed annually by the governing body/proprietor/leadership who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and Headteacher will ensure regular reporting on safeguarding activity and systems to the governing body/proprietor/leadership. The governing body/proprietor/leadership will not receive details of individual pupil/student situations or identifying features of families as part of their oversight responsibility.

## **2. KEY RESPONSIBILITIES**

### **2.1 Governance and leadership**

- The Trust Board and Leadership Team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The Trust Board have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Trust Board will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The Trust Board are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
- The Trust Board and Leadership Team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The Headteachers ensure that our child protection and safeguarding policies and procedures adopted by The Trust Board, are understood, and followed by all staff.
- The Trust Board will ensure an appropriate senior member of staff, from the school Leadership Team, is appointed to the role of designated safeguarding lead. The Trust Board and Leadership Team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

- The school has a nominated governor (or equivalent) for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

## **2.2 Designated Safeguarding Lead (DSL)**

- The Golden Thread Alliance has appointed a member of the Senior Leadership Team, as the Designated Safeguarding Lead (DSL) in each school.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The Golden Thread Alliance has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.

School	Fleetdown	Oakfield	Temple Hill	West Hill
<b>Head Teacher: Lead DSL in all schools</b>	Alice Harrington	Rajinder Kaur-Gill	Leon Dawson	Katy Ward
<b>School Lead DSL-SL DSL</b>	Toniann Braniff	Jill Gosbee	Dinah Lowdell	Katy Ward
<b>Deputy DSL's DDSL</b>	Sophie Dalton Vikki Coombes Tom Leach Nicola King	Julia McCloskey Nicola Dixon EYFS ONLY/CP Layla Collins Karen Thomas Gemma Rutherford	Jaya Dillion James Davies Claire Miller Laura Bates Emma Howe Melissa Scott James Fordham	Pennie Hills Rachel Roe Jane Knight Danielle Davenport Carla Woodbridge

School	Culverstone Green	Meopham	Riverview Infants	Riverview Juniors	Wrotham Road
<b>Head Teacher: Lead DSL in all schools</b>	Adrian Watson	Michele Sowden-Mehta	James Bernard	Aaron Jones	Sarah Jack
<b>School Lead DSL-SL DSL</b>	Nicola Guy Micheal Burbeck	Karen Jackson Sarah Dean	Michelle Baillie	Jack Morrison Jack Keen Sam Ward Megan Corcoran	Rachel Evans Ritu Bhathal Emma Gent
<b>Deputy DSL's DDSL</b>	Louise Blunderfield	Charlotte Casey	Emma Booker	Sarah Jones	Andy Bennett

- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2022. This includes but is not limited to:
  - Acting as the central contact point for all staff to discuss any safeguarding concerns
  - Maintaining a confidential recording system for safeguarding and child protection concerns
  - Coordinating safeguarding action for individual children

- When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
- Liaising with other agencies and professionals in line with KCSIE 2022 and WTSC 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed, as necessary.
- Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
- Managing and monitoring the school role in any multi-agency plan for a child.
- Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Liaising with the Headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

### **2.3 Members of staff**

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
  - provide a safe environment in which children can learn.
  - be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.

- know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
- be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- be prepared to identify children who may benefit from early help.
- understand the early help process and their role in it.
- understand the school safeguarding policies and systems.
- undertake regular and appropriate training which is regularly updated.
- be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- know how to maintain an appropriate level of confidentiality.
- reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- act in line with Teachers' Standards 2012 which state that teachers (including Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- We recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
- We will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff behaviour and pupil behaviour policies.

## **2.4 Children and young people**

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

## **2.5 Parents and carers**

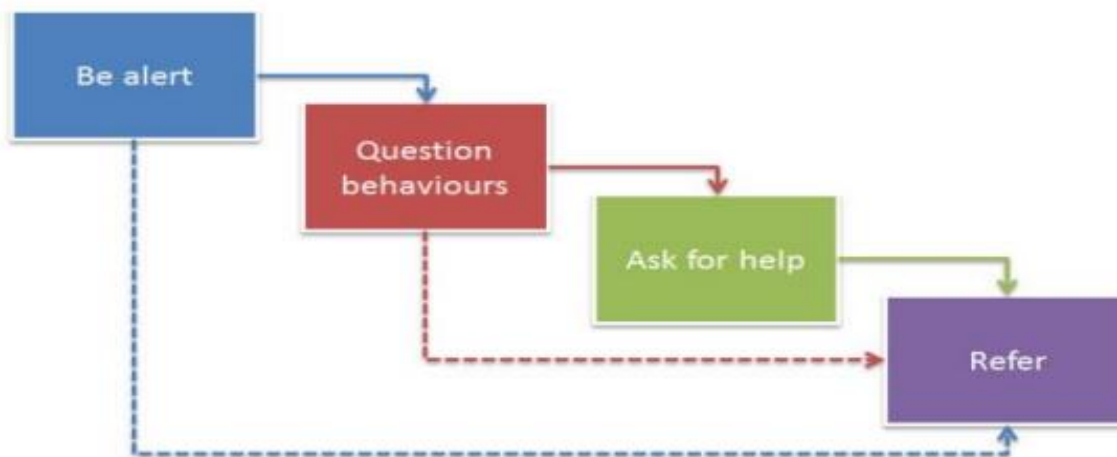
- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant school policies and procedures.
  - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.

- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from the school or other agencies.

### 3. CHILD PROTECTION PROCEDURES

#### 3.1 Recognising indicators of abuse and neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2022. This is outlined locally within the Kent Support Levels Guidance.
- The Golden Thread Alliance recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:



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

- The Golden Thread Alliance recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at



different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

- The Golden Thread Alliance recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- The Golden Thread Alliance recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- The Golden Thread Alliance recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy and/or ['Searching, Screening and Confiscation' policy](#) which is informed by the DfE 'Searching, screening and confiscation at school' guidance. *Amend as appropriate to school policy requirements and decisions. The national DfE 'Searching, Screening and Confiscation' guidance was updated July 2022 and we recommend Headteachers and DSLs read it in full.*
  - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil/student was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil/student who has been searched to assess the incident against any potential wider safeguarding concerns.
  - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

### **3.2 Responding to child protection concerns**

- If staff are made aware of a child protection concern, they are expected to:

- listen carefully to child, reflecting back the concern.
  - use the child's language.
  - be non-judgmental.
  - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern using the facts as the child presents them and any updates via MyConcern, in line with school record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
  - The DSL or a deputy should always be available to discuss safeguarding concerns. In exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 6). In these circumstances, any action taken will be shared with a DSL as soon as is possible.
  - All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
  - The Golden Thread Alliance will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
    - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: <https://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services>
  - Where it is identified a child may benefit from Early Help support (as provided by [ICS](#)), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
    - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking

advice via the [Education Safeguarding Service](#) if the situation does not appear to be improving or is getting worse.

- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures.
  - The Golden Thread Alliance recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
  - The DSL may seek advice or guidance from an Area Education Safeguarding Advisor from the [Education Safeguarding Service](#) before deciding next steps.
  - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the KSCMP escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the [Education Safeguarding Service](#).

### 3.3 Recording concerns

Note: schools should amend this section to reflect their own local processes, for example, whether they use an electronic system or paper concern forms.

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system, MyConcern and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.
- Incident/Welfare concern forms are kept on MyConcern. Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.

- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-ordinators (SENCOs) or named person with oversight for SEN, are made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

### **3.4 Multi-agency working**

- The Golden Thread Alliance recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- The school leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- The Golden Thread Alliance recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

- The School will allow access for Kent Children’s Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The Headteacher and DSL are aware of the requirement for children to have an Appropriate Adult [PACE Code C 2019](#) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school ‘Searching, Screening and Confiscation’ policy and/or behaviour policy, which is informed by the DfE ‘Searching, screening and confiscation at school’ guidance. Note: Headteachers should access the updated DfE ‘Searching, screening and confiscation at school’ guidance.

### **3.5 Confidentiality and information sharing**

- The Golden Thread Alliance recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- The Golden Thread Alliance has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. The Trust DPO is Claire Misy.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2022). KCSIE 2022, the [Information Commissioner's Office \(ICO\)](#) and the DfE '[Information Sharing Advice for Safeguarding Practitioners](#)' (2018) guidance provides further details regarding information sharing principles and expectations. This guidance is available to staff in the Resource section of MyConcern, and to Parents/Carers on request.
- The Headteacher and DSL will disclose relevant safeguarding information about a pupil/student with staff on a ‘need to know’ basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our code conduct policy. Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children’s Services. All staff are
- aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

### **3.6 Complaints**

- All members of the school community should feel able to raise or report any concerns about children’s safety or potential failures in the school safeguarding regime. The school

has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on individual school websites or can be obtained from the school on request.

- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- The leadership team at The Golden Thread Alliance will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

#### **4. SPECIFIC SAFEGUARDING ISSUES**

- The Golden Thread Alliance is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2022 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

##### **4.1 Child-on-child abuse**

- All members of staff at The Golden Thread Alliance recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.
- The Golden Thread Alliance recognises that child-on-child abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - Abuse in intimate personal relationships between children
  - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - Sexual violence and sexual harassment
  - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Upskirting (which is a criminal offence), which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - Initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2022 (in particular, part two and five).
- The Golden Thread Alliance adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- The Golden Thread Alliance recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, The Golden Thread Alliance will:
  - Take all concerns raised seriously
  - Ensure that the children are at the centre of the actions
  - Provide a range of support mechanisms such as 1:1 work, therapeutic services and family support services
  - The implementation of a robust anti-bullying policy
  - Provision of age/ability appropriate PSHE and RSE curriculum
  - All child-on-child abuse to be managed as a Safeguarding concern which includes reporting incidents on MyConcern and appropriate Safeguarding action being taken routinely to protect the child from significant harm.
- The Golden Thread Alliance wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about pupils’ behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection

policies. Note: section 89(5) of the Education and Inspections Act 2006 gives Headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises, for example, when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable. This legislation is for schools only and is not applicable to independent schools.

- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
  - Taking reports seriously and staff listening carefully
  - Avoiding victim blaming
  - Providing appropriate pastoral support
  - Working with parents/carers
  - Reviewing educational approaches
  - Following procedures as identified in other policies e.g. the schools anti bullying behaviour and child protection policy
  - Where necessary and appropriate, informing the police and/or ICS

#### **4.2 Child-on-child sexual violence and sexual harassment**

- When responding to concerns relating to child-on-child sexual violence or harassment, The Golden Thread Alliance will follow the guidance outlined in Part five of KCSIE 2022.
- The Golden Thread Alliance recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' The Golden Thread Alliance recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- **ALL** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.
- The Golden Thread Alliance recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- The Golden Thread Alliance recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling



someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
  - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and relevant local/national guidance and support, for example [KSCMP](#) procedures and support from [The Education Safeguarding Service](#).
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
  - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
  - the wishes of the victim in terms of how they want to proceed.
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
  - the ages of the children involved.
  - the developmental stages of the children involved.
  - any power imbalance between the children.
  - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - understanding intra familial harms and any necessary support for siblings following incidents.
  - whether there are any ongoing risks to the victim, other children, or school staff.
  - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a

parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure how to proceed, advice will be sought from [The Education Safeguarding Service](#).

### **4.3 Nude and/or semi-nude image sharing by children**

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups.

- The Golden Thread Alliance recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
  - to report any concerns to the DSL immediately.
  - never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  - not to delete the imagery or ask the child to delete it.
  - to avoid saying or doing anything to blame or shame any children involved.
  - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
  - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
  - to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: [:Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- A referral will be made to ICS and/or the police immediately if:
  - the incident involves an adult (over 18).
  - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
  - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
  - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

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

- The Golden Thread Alliance recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in 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. CSE and CCE 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.
- The Golden Thread Alliance recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- The Golden Thread Alliance recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any

child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.5 Serious violence**

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

#### **4.6 So-called Honour Based Abuse (HBA)**

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
  - If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Whilst the Government guidance specifies that this guidance applies to teachers, it is the expectation of The Golden Thread Alliance that all staff share this responsibility.

#### **4.7 Preventing radicalisation**

- The Golden Thread Alliance is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- The Golden Thread Alliance recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow. If there is an immediate threat, the police will be contacted via 999.

#### **4.8 Cybercrime**

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

#### **4.9 Domestic abuse**

- The Golden Thread Alliance recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse. Children can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children’s health, well-being, development, and ability to learn.
- The Golden Thread Alliance is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.10 Mental health**

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

- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

## **5. SUPPORTING CHILDREN POTENTIALLY AT GREATER RISK OF HARM**

- Whilst all children should be protected, The Golden Thread Alliance acknowledges that some groups of children are potentially at greater risk of harm.

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

- The Golden Thread Alliance acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- The Golden Thread Alliance recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our schools will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENDco to plan support as required.
- Our schools have robust intimate/personal care policies which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems.

### **5.2 Children requiring mental health support**

- Our schools have an important role to play in supporting the mental health and wellbeing of our pupils/students. 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.
- Where there are concerns regarding possible mental health problems for pupils, staff should:
  - Report concerns of MyConcern
- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience.

### **5.3 Children Missing from Education (CME)**

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation - particularly county lines. A robust response to children missing from education will support the identification of such abuse and may help prevent the risk of children going missing in the future.
- Where possible, the school will hold more than one emergency contact number for each pupil/student so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.
- Where the school have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children Missing Education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance \(PIAS\)](#).

### **5.4 Elective Home Education (EHE)**

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#). We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

### **5.5 Children who need a social worker (child in need and child protection plans)**

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

### **5.6 Looked after children, previously looked after children and care Leavers**

- The Golden Thread Alliance recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- Our schools appoint a '[designated teacher](#)' who works with local authorities, including the [Virtual School Kent](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

- Where the school believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

### **5.7 Children who are Lesbian, Gay, Bi, or Trans (LGBT)**

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, The Golden Thread Alliance recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- The Golden Thread Alliance recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

## **6. ONLINE SAFETY**

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Golden Thread Alliance will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- The Golden Thread Alliance will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- The Golden Thread Alliance identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.



- The Golden Thread Alliance recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The Headteacher will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to The Trust Board.

### **6.1 Policies and procedures**

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy, Social Media policy and behaviour policies.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The Golden Thread Alliance uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- The Golden Thread Alliance recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2022 and EYFS 2021 The Golden Thread Alliance has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found in the Resource section of MyConcern and on school websites.

### **6.2 Appropriate filtering and monitoring**

- The Golden Thread Alliance will do all we reasonably can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place. If pupils or staff discover unsuitable sites or material, they are required to turn off the screen, and report the concern immediately to a member of SLT and report the URL of the site to technical services.
  - Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
  - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.

- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
  - Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the [Internet Watch Foundation](#) and the police.
  - When implementing appropriate filtering and monitoring, The Golden Thread Alliance will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of The Golden Thread Alliance’s approach to online safety
    - Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
    - Internet use will be supervised by staff as appropriate to pupils age and ability.
    - Pupils will be directed to use age/ability appropriate online resources and tools by staff.

### **6.3 Information security and access management**

- The Golden Thread Alliance is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in the Trust acceptable use policies, Mobile Use of Technology and online safety policy.
- The Golden Thread Alliance will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

### **6.4 Remote/Online learning**

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

- DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)
  - NSPCC: [Undertaking remote teaching safely](#)
  - The Education People: [Remote Learning Guidance for SLT](#)
- The Golden Thread Alliance will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
  - All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems: Google Classroom, Microsoft 365 or equivalent.
    - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
  - Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy, code of conduct, remote learning and Acceptable Use Policies.

- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP) A template remote learning AUP for schools to adapt is available here. If schools do not have a remote learning AUP, key messages and expectations should be included within this policy or added within existing AUPs.

### 6.5 Staff training

- The Golden Thread Alliance will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

### 6.6 Educating pupils

- The Golden Thread Alliance will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.
- DSLs and leaders may find it helpful to access UK Council for Internet Safety (UKCIS) [Education for a Connected World Framework](#) and DfE [Teaching online safety in school](#) guidance.

### 6.7 Working with parents/carers

- The Golden Thread Alliance will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:
  - Providing information on our school website and existing communication channels (such as official social media, newsletters etc)
  - Offering specific online safety events for parents/carers or highlighting online safety at existing events
- The Golden Thread Alliance will ensure parents and carers understand what systems are used to filter and monitor their children’s online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:
  - Providing information on our school website and relevant policies such as acceptable use, home/school agreements and through existing communication channels.
- Where the school is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE [Harmful online challenges and online hoaxes](#) guidance to ensure we adopt a proportional and helpful response.
- Additional local advice and support is available for DSLs and SLT via the Education Safeguarding Service: [Think before you scare](#).

## **7. STAFF ENGAGEMENT AND EXPECTATIONS**

### **7.1 Staff awareness, induction and training**

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2022 which covers safeguarding information for staff.
  - School leaders, including the DSL will read KCSIE in its entirety.
  - School leaders and all members of staff who work directly with children will read annex B.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the safeguarding partners.
- All Governors and Trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually.
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- The Golden Thread Alliance recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies.
- The DSL and Headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained.

### **7.2 Safer working practice**

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school behaviour policy/code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read our child protection policy and are aware of the school expectations regarding safe and professional practice via the staff behaviour policy/code of conduct and Acceptable Use Policy (AUP).

- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies, including staff behaviour policy, mobile and smart technology, Acceptable Use Policies (AUPs), and social media.

### **7.3 Supervision and support**

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **8. SAFER RECRUITMENT AND ALLEGATIONS AGAINST STAFF**

### **8.1 Safer recruitment and safeguarding checks**

- The Golden Thread Alliance is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
  - The Golden Thread Alliance will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
  - The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.

- The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Golden Thread Alliance are 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.
- Where the school places a pupil with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
  - The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE 2022.

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

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2022) and the [local Kent allegations arrangements](#). In depth information can be found within our 'Managing Allegations against Staff' and Staff Code of Conduct Policy. This can be found on our website or is available to staff via MyConcern.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where Headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Headteachers (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

### **8.2.1 Concerns that meet the 'harm threshold'**

- The Golden Thread Alliance recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
  - behaved in a way that has harmed a child, or may have harmed a child

- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Headteacher who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Headteacher staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

### **8.2.2 Concerns that do not meet the ‘harm threshold’**

- The Golden Thread Alliance may also need to take action in response to ‘low-level’ concerns about staff. Additional information regarding low-level concerns is contained with our staff behaviour code of conduct – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
  - The Golden Thread Alliance has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
  - A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff behaviour policy/code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.
  - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our code of conduct policies. Note: Whether all low-level concerns are shared initially with the DSL or another nominated person, or with the Headteacher is a matter for individual schools to decide. If low-level concerns are reported to the DSL, they should inform the Headteacher of all low-level concerns in a timely fashion according to the nature of each particular concern. Additionally, the Headteacher may wish to consult with the DSL and take a more collaborative decision-making approach.

- Where low-level concerns are reported to the school, the Headteacher will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
- The Headteacher will share concerns and liaise with the LADO enquiries officer via the [LADO enquiry line](#).
- Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
- If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the school will implement appropriate action, for example consulting with the [LADO enquiry line](#) and following our disciplinary procedures.

### **8.3 Safe Culture**

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our Staff Code of Conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at The Golden Thread Alliance will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).



- The Golden Thread Alliance has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
  - If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#)

## **9. OPPORTUNITIES TO TEACH SAFEGUARDING**

- The Golden Thread Alliance will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships Education and other areas of the curriculum such as PSHE
- We recognise that school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- The Golden Thread Alliance recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares pupils/students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.
- The Golden Thread Alliance has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- The Golden Thread Alliance recognises that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.
- Our school systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

Note: Resources to support schools and colleges can be found in part two of KCSIE and annex B.

## **10. PHYSICAL SAFETY**

### **10.1 Use of 'reasonable force'**

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour Policy and is in line with the DfE '[Use of reasonable force in schools](#)' guidance. Note: Further advice can be accessed in Part Two of KCSIE.

### **10.2 The use of premises by other organisations**

- Where services or activities are provided separately by another body using the school facilities/premises, the Headteacher and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

### **10.3 Site security**

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

## 11. LOCAL SUPPORT

- All members of staff in The Golden Thread Alliance are made aware of local support available.
  - **Education Safeguarding Service**
    - **Area Safeguarding Advisor**  
Anup Kandola: 03000 412445  
<https://www.theeducationpeople.org/our-expertise/safeguarding/safeguarding-contacts/>
    - **Online Safety in the Education Safeguarding Service**  
03000 415797  
[esafetyofficer@theeducationpeople.org](mailto:esafetyofficer@theeducationpeople.org) (non-urgent issues only)
  - **LADO Service**
    - Telephone: 03000 410888
    - Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
  - **Integrated Children's Services**
    - Front door: 03000 411111
    - Out of Hours Number: 03000 419191
  - **Early Help**
    - [www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-services](http://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-services) and [www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts](http://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts)
  - **Kent Police**
    - 101 or 999 if there is an immediate risk of harm
    - Insert details for local support e.g. school officer.
  - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
    - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
    - [www.kscmp.org.uk](http://www.kscmp.org.uk)
    - 03000 421126
  - **Adult Safeguarding**
    - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

# Appendix 1:

## THE GOLDEN THREAD ALLIANCE JOINT WORKING PROTOCOL WITH POLICE AND CHILDREN'S SOCIAL CARE

### 1. Introduction

This protocol has been developed in acknowledgement of the outcomes and lessons learned from the serious case review of child Q. In The Golden Thread Alliance, we have a keen understanding that some of our children and their families face discrimination and our values of Respect, Responsibility and Equality are embedded in our pledges to keep learning and moving forward in addressing inequalities for all of our children within the Trust. Our Pledges can be found through the link provided below:

<https://primarysite-prod-sorted.s3.amazonaws.com/galaxy-trust/UploadedDocument/be2b24a0-3ed5-4dfa-9f23-5390e13ebc6c/galaxy-trust-pledges-2021-22-small.pdf>

Our aim is to promote good practice and improve joint working between School, the Police and Children's Social Care where it is believed a child may be at risk of significant harm.

Aims of the joint protocol:

- To conduct timely and effective child protection investigations that are child centred and prioritise the child's physical and mental health. To ensure that the voice of the child is in the centre of all investigations and work.
- To promote positive relationships between the Police and Social Care in accordance with the KCSIE 2021 and Working Together to Safeguarding Children Guidance.
- To ensure consistency in practice
- To implement the Achieving Best Evidence Guidance without compromising the existing Galaxy Trust Policies including the Safeguarding, Behaviour, Staff Code of Conduct, Visitor Code of Conduct and Search and Confiscate policies.
- To make the best use of the skills of School Staff, social workers and police officers.
- To promote a culture of professional challenge to promote the best interests of the child. For staff to understand their role in challenging the practices and decisions made by outside agencies with confidence and in accordance to the Kent Escalation and Professional Challenge Policy.
- Parents and Carers to be involved in any Safeguarding incidents related to their child and consent sought, unless doing so puts the child at risk (KCSIE 2021).

### 2. Section 47 Enquires

Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, the local authority is required under Section 47 of the Children Act 1989 to make enquiries to enable it to decide whether it should take any action to safeguard and promote the welfare of the child.

Children's Social Care has the statutory duty to make, or cause to be made, enquiries when the circumstances defined in Section 47 of the Children Act 1989 exist.

The Police's responsibilities include to undertake criminal investigations of suspected or actual crime and also, to protect life and limb. Where both Children's Social Care and the police have responsibilities with respect to the child, they must coordinate to ensure the parallel process of a Section 47 enquiry and a criminal investigation is undertaken in the best interests of the child to ensure better outcomes for children and young people.

The Children Act 1989 places a statutory duty on health, education and other services to help the local authority carry out its social services functions under Part 3 of the Children Act 1989 and Section 47 enquiries. All agencies then have a duty to assist and provide information in support of child protection enquiries.

An enquiry under Section 47 of the Children Act 1989 can only be initiated following a decision from a strategy discussion.

### **3. Strategy discussion**

Wherever there is reasonable cause to suspect a child is suffering or is likely to suffer significant harm there should be a strategy discussion including social care, the police, health, the referring agency and any other professional as appropriate which includes school.

A strategy meeting can take place following a referral or at any other time including during an assessment or on an open case. The strategy discussion should take place within 24 hours of the decision to hold it. The purpose of the strategy discussion is to: (Working Together P40):

- Share information.
- Agree a safeguarding plan for the child
- Agree the conduct and timing of any criminal investigation;
- Decide whether enquiries under Section 47 of the Children's Act should be undertaken by whom and when.
- Decide whether a medical should be undertaken.

The discussion should be chaired by a CSC/Team Manager or Assistant Team Manager and fully recorded including a clear action plan and timescales for completion. The decision of the strategy discussion will be circulated by CSC within 24 hours for actions to be agreed and recorded.

School should be involved in strategy discussions unless incidents are urgent or dealt with out of hours. In which case, school need to be made aware as soon as possible and informed before any visits to the school take place.

The primary focus of the Section 47 enquiry will be on the safety, welfare and needs of the child:

- Child will be interviewed in accordance with the multi-agency child protection procedures, and the Achieving Best Evidence Guidance, and records will be kept accordingly. School staff and/or parents are to be invited to participate in these interviews unless doing so puts the child in further risk of harm or distress.
- The child's communication needs and abilities, age and developmental level and understanding, and any special needs they may have, will be given full consideration in all aspects of the investigation.
- Video recorded interviews with children under 'achieving best evidence' (ABE) will not take place in school but will need to be completed at the Police station unless in exceptional circumstances and with the consent of the Parent/Carer.

#### **4. The Investigation Team**

At a minimum, the investigative team should consist of a police officer and social worker and any professional with knowledge about the child (school professional or parent/carer).

The police will always lead the criminal investigation. In terms of the ABE it should be the person who has or is likely to establish the best rapport with the child who should lead the interview.

#### **5. Seeing the child**

'Seeing the child' includes observing and communicating with them, as appropriate given their age and understanding, ascertaining their wishes and feelings about the concerns that have been expressed, and taking those wishes into account. Exceptionally, a joint enquiry/investigation team may need to speak to a suspected child victim without the knowledge of the parent of caregiver.

This will be decided in the Strategy Discussion.

Children's Social Care should always seek the parents' co-operation but if the parents refuse access to a child – and where concerns about that child's safety do not require an urgent response for example an Emergency Protection Order – the local authority may consider applying to the court for a Child Assessment Order. The School will comply with any Court Order issued.

#### **6. Medical examination/Physical Search**

All investigations requiring intimate access to the child to assess and record any physical evidence of physical or sexual assault against a child are not to take place in school but must take the form of a Child Protection Medical performed by the appropriate practitioners (GPs, Safeguarding Medical Lead/SARC) in a medical setting or by Police Detectives as per their own policies within the police station.

Any investigations requiring the child to be questioned and subsequently searched for illegal or dangerous items must adhere to The Golden Thread Alliance Search and Confiscate Policy which includes the prohibition of children being asked to remove any garments that are not deemed "outer clothing" (coats, hats, scarves, etc.). Parent consent to be obtained unless doing so puts the child at additional risk.

In the event of an emergency where an immediate intimate search is required to protect the child from significant harm, Emergency Health Services are to be called and the child taken to an appropriate medical centre to receive the care that is required.

#### **7. Escalation**

The Kent Safeguarding Children Multi-Agency Partnership (KSCMP) Escalation policy applies to any disagreement arising from interpretation of or adherence to this protocol. A full copy of the policy can be found on the KSCMP website.

#### **8. Review Date**

This protocol will be reviewed in September 2024 unless there is a need to do so sooner in respect of changes to the KCSIE and Working Together Legislation.

# Appendix 2: Categories of Abuse

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

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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

## **Signs that MAY INDICATE Sexual Abuse**

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

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

## **Signs that MAY INDICATE physical abuse**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks

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

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

**Signs that MAY INDICATE emotional abuse**

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

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



**Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

# Appendix 3: Support Organisations

## NSPCC 'Report Abuse in Education' Helpline

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

## National Organisations

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

## Support for Staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

## Support for Learners

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

## Support for Adults

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

## Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

## Contextual Safeguarding Network

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

## Kent Resilience Hub

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

## Substance Misuse

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

## Domestic Abuse

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

## Criminal and Sexual Exploitation

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals:  
<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

## Honour Based Abuse

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information:  
[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

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

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

- Diana Award: [www.antibullyingpro.com/](http://www.antibullyingpro.com/)
- Bullying UK: [www.bullying.co.uk](http://www.bullying.co.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

### **Online Safety**

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

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)

### **Radicalisation and hate**

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

### **Children with Family Members in Prison**

National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>

## Document Control - Changes History

Version	Date	Owned and amended by	Recipients	Purpose
V1	February 2023	Deputy Chief Executive Officer	All staff, Members, Trustees and Local Governors	This policy has been updated in recognition of the merger of The Galaxy Trust and The Pathway Academy Trust to form "The Golden Thread Alliance" with effect from 1 <sup>st</sup> January 2023. This policy is therefore in force for all nine academies of The Golden Thread Alliance.

### Policy Tier

<input checked="" type="checkbox"/> Tier 1	<input type="checkbox"/> Tier 2	<input type="checkbox"/> Tier 3	<input type="checkbox"/> Tier 4
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**Owner:** Deputy Chief Executive Officer of The Golden Thread Alliance

**Contact in case of query:** Deputy Chief Executive Officer of The Golden Thread Alliance

### Approvals

This document requires the following approvals.

Name	Position /Meeting	Date Approved	Version
Board of Trustees (significant changes only to the policy)	NA – staff names/roles for additional academies from The Pathway Academy Trust added only	NA	1.0

### Position with the Unions

Does the policy or changes to the policy require consultation with the Unions under our recognition agreement?

- Yes  
 No

### Location

Tick all that apply:

- The Golden Thread Alliance website  
 School website  
 Policy portal  
 Other: state

### Customisation

- The Golden Thread Alliance Policy  
 The Golden Thread Alliance with an attachment for each school to complete regarding local arrangements  
 School policy

### Distribution

This document has been distributed to:

Name/School	Position	Date	Version
All staff in the academies and Central Team operated by The Golden Thread Alliance	All roles	22 <sup>nd</sup> February 2023	1.0
Governance Groups of The Golden Thread Alliance	Members, Trustees and Local Governors	22 <sup>nd</sup> February 2023	1.0