POLICY UPDATED: **in effect from 1st September 2023**
NEXT POLICY REVIEW: **September 2024**
REVIEW SCHEDULE: **Annually or subject to immediate review in line with statutory changes**
STAFF RESPONSIBLE: **PS**
GOVERNOR RESPONSIBLE: **Chair of Governors**

Gad's Hill School
Safeguarding (Child Protection) Policy

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1. Key Contacts

1.1. Gad's Hill School Safeguarding Contact Details

Position	Name	Phone	E-mail	NOTES
Chair of Governors / Designated Governor for Safeguarding	Mrs Kirsty Hillocks	01474 822366	k.hillocks@gadshillschool.org	Mrs Hillocks will step down from these twin roles during the autumn term 2023. This policy will be updated once new appointments are confirmed
Headmaster / Lead DSL	Mr Paul Savage	01474 822366	p.savage@gadshillschool.org	DSL Renewal due: October 2023

Head of Upper School	Miss Louise Tucker	01474 822366	l.tucker@gadshillschool.org	DSL Renewal due: September 2024
Head of Lower School / Deputy DSL	Miss Samantha Long	01474 822366	s.long@gadshillschool.org	DSL Renewal due: November 2024
Lower School Senior Leader / Deputy DSL	Mrs Victoria Grant	01474 822366	v.grant@gadshillschool.org	PART-TIME: Monday, Wednesdays, Friday am DSL Renewal due: October 2023
Manager of EYFS / Deputy DSL	Mrs Debbie Mills	01474 822366	d.mills@gadshillschool.org	DSL Renewal due: November 2023
School Nurse	Mrs Louise Furby	01474 822366	l.furby@gadshillschool.org	
Inclusion Leader	Mrs Julia Hurren	01474 822366	j.hurren@gadshillschool.org	JH is not a named Deputy DSL but has undertaken DSL training; frequently involved in Safeguarding matters arising from SEND issues. Renewal due: June 2024

1.2. Kent & National Safeguarding Contact Details

Organisation	**Notes**	**Phone**	**Other Contacts**
Police Emergency	If a child may be at risk of imminent harm	999	
Kent Safeguarding Children Partnership **Integrated Front Door**	If a child may be at risk of imminent harm	03000 4111111	(outside office hours: 03000 419191)
Police Non-Emergency		111	
Kent Education Safeguarding Advisor **Gravesham**	For advice on safeguarding issues	03000 412445	
Kent LADO Team	Allegations against childcare professionals	03000 410888	kentchildrenslado@kent.gov.uk Kroner House, Eurogate Business Park, Ashford, Kent, TN24 8XY
Early Help	Local services to support families to meet educational, social and emotional needs	Kent: 03000 419222 Medway: 01634 338746	Kent: earlyhelp@kent.gov.uk Medway: ehsupport@medway.gov.uk

Kent Education Safeguarding Service **Online Safety**		03000 415797	
Kent Children Missing Education Team		03000 412121	cme@kent.gov.uk
NSPCC		0800 800 5000	
Childline		0800 1111	
Kidscape	Anti-bullying advice for parents		
Counter Extremism / Prevent Duty		Emergency: 999 Anti-terrorist hotline: 0800 789321	Advice line for staff/governors: 02073407264 Counter-extremism@education.gsi.gov.uk
Reporting FGM	Call Police	999	
Child Exploitation & Online Protection Command (CEOP)		0870 000 3344	https://www.ceop.police.uk/safety-centre/
UK Safer Internet Centre		0344 3814772	helpline@saferinternet.org.uk

NPCC – When to Call the Police: Guidance for schools & colleges

1.3. Reporting a Concern

Any concerns of a safeguarding nature should be reported as soon as possible to the DSL or a Deputy DSL. Allegations against a member of staff should be referred to the Headmaster. Allegations against the Headmaster should be referred to the Chair of Governors. Further advice can be sought from the DSL about reporting mechanisms and read within this policy. Key contacts for Gad's Hill School are provided in this section of the policy. However, it should be noted that a concern can be registered directly with the Local Education Safeguarding Advisor (03000 412445) without the need to liaise with the DSL, and in an emergency or if a crime is believed to have been committed, direct contact with the Police can be made by telephoning 999.

2. Introduction

2.1. Policy Purpose

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- *protecting children from maltreatment;*
- *preventing the 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.*

(Keeping Children Safe in Education, September 2022.)

This policy applies to all pupils in the School.

The purpose of this policy is to inform staff, parents, contractors, volunteers and governors about the School's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils – even where this is away from the School, such as on educational visits.

This Policy:

- reflects the whole school approach to child on child abuse;
- reflects reporting systems;
- describes procedures which are in accordance with government guidance;
- refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners;
- reflects serious violence.
- is reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

This policy is published on the School website, on the School intranet (SIS) and is also available to parents of current and prospective pupils from the School on request. The policy is shared within the application information pack for all recruitment vacancies and provided to new colleagues at induction, along with the current version of Part One of Keeping Children Safe in Education.

The policy is drafted in accordance with all relevant legislation and the following statutory guidance:

- Keeping Children Safe in Education, *September 2022 (KCSIE)*
- Working Together to Safeguard Children, *July 2018 (WTSC)*
- Prevent Duty Guidance for England and Wales, *Updated April 2021*
- Disqualification Under the Childcare Act, *August 2018*
- Education (Independent School Standards) Regulations, *2014*
- Kent agreed inter-agency procedures *(see https://kentchildcare.proceduresonline.com/chapters/contents.html)*
- What to do if you are worried a child is being abused – advice for practitioners, *March 2015*
- Safeguarding children and young people, *October 2018*
- Children Missing Education, *September 2016*
- Relationships Education, Relationships and Sex Education and Health Education *2019*
- Strategy for dealing with safeguarding issues in charities, *December 2017*

- Safer Working Practices, Safer Recruitment Consortium, *May 2019*

We follow the procedures of the Kent Safeguarding Children Multi-Agency Partnership. We are advised by the local Education Safeguarding Advisor, whom the DSL consults on safeguarding matters.

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

The School also maintains the following associated policies:

- Behaviour Management Policy
- Anti-Bullying Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- SMSC and RSE Policy
- E-safety Policy

2.2. Principles

Gad's Hill School is committed to safeguarding and promoting the welfare of all pupils in our care, and expects all staff, governors and volunteers to share this commitment. To achieve this, the School seeks to create a safe school environment and a strong pastoral system. Staff are trained to listen to pupils' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.

The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the separate Safer Recruitment Policy;
- ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
- follow the local inter-agency procedures of the Kent Safeguarding Children Multi-Agency Partnership and contribute to inter-agency working;
- support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Family (TAF) approach;
- be alert to signs of abuse, both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- deal appropriately with every suspicion or complaint of abuse and support pupils who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of pupils with physical and mental health conditions;
- operate robust and sensible health and safety procedures;
- operate clear and supportive policies on drugs, alcohol and substance misuse;

- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that School premises are as secure as circumstances permit;
- teach pupils about safeguarding issues and about how to keep themselves safe (including online); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

3. Roles & Responsibilities

3.1. All Staff (including governors and volunteers)

All staff are under a general legal duty to:

- contribute to providing a safe environment in which children can learn;
- attend appropriate safeguarding (including online safety) and child protection training, annually as directed by the DSL and as and when additional updates are required;
- be aware of indicators of the different forms of abuse and neglect;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures and follow them;
- know how to access and implement the procedures, independently if necessary – including awareness of local early help processes and the process for making referrals to children's social care;
- be aware of procedures for dealing with child on child abuse;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy;
- be prepared to follow up concerns raised with a DSL/DDSL if they are uncertain that satisfactory action has been taken; and
- support social services and any other agencies following any referral.

Staff members working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child and take action in order to enable the best outcome for the child.

All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware 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 harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

3.2. The Designated Safeguarding Lead (DSL)

The School's Designated Safeguarding Lead (DSL) is the Headmaster. The DSL takes lead responsibility for safeguarding (including online safety) and child protection, and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection.

The School also has a team of Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the School at all times.

A full description of the responsibilities of the DSL is set out in Appendix A of this policy but can be summarised as follows:

Raise awareness

- provide support, advice and expertise on all matters concerning safeguarding;
- encourage a culture among staff of listening to pupils that takes into account their wishes and feelings;
- ensure this Policy is known, understood and used appropriately, and reviewed at least annually;
- monitor the operation of this policy and regularly review and update the School's child protection procedures and their implementation, working with the governors as necessary;

- ensure that all members of staff and volunteers receive the appropriate training on child protection, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding; and

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Manage referrals

- advise and act promptly upon all safeguarding concerns reported to them;
- refer cases of suspected abuse to the local authority children's social services and the Local Authority Designated Officer (LADO) where appropriate, support staff who make or consider making any such referrals and liaise with the local authority children's social services on behalf of the School as required;
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make or consider making any such referrals;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service;
- refer cases where a crime may have been committed to the police;
- keep detailed, accurate, secure written records of concerns or referrals;
- where appropriate, take part in child protection conferences or reviews by the local authority;
- keep the Chair of Governors informed of concerns and actions, especially ongoing enquiries under s47 Children's Act 1989 and police investigations;
- monitor records of pupils in the School who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received; and
- monitor the confidentiality and storage of records relating to child protection and where a pupil leaves, ensure their child protection file is copied for the new school as soon as possible and within **5 days** for an in-year transfer or within **the first 5 days of the start of a new term** to allow the new school or college to have support in place for when the child arrives.and transfer it separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained.

Prevent

- understand and support the School with regard to the requirement of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation

Additionally, as Headmaster, the DSL is responsible for ensuring that the procedures outlined in this Policy are followed on a day-to-day basis. To this end the Headmaster will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- the allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively is given, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- matters which affect pupil welfare are adequately risk assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy;
- pupils are provided with opportunities throughout the curriculum and wider co-curricular programme to learn about safeguarding, including keeping themselves safe online;
- ensure safer recruitment procedures in line with Part 3 of KCSIE, September 2022 are being adhered to;

- they liaise with Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer; and
- they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

3.3. Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL, a deputy will assume responsibility for all the activities described above.

On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL. All Deputy DSLs meet weekly with the DSL to review ongoing cases, implementation of the safeguarding development plan and discuss safeguarding strategy within the School.

3.4. Governing Body

The Governing Body has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. It is the role of the Governing Board to provide scrutiny of Safeguarding Policy and practice. The governing body takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end the Governors will ensure that:

- an effective, up to date child protection policy is in place and made available on the School's website;
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- all staff receive safeguarding training in accordance with this Policy;
- pupils are taught about safeguarding, including online safety;
- the School's safeguarding arrangements take into account the procedures and practice of the Kent Safeguarding Children Multi-Agency Partnership;
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified;
- appropriate filters and monitoring systems are in place to keep children safe online; and
- the School reports to their local authority any child who joins or leaves at non-standard transition times in line with statutory and local authority guidance.

The Governing Body will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the Governing Body will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to

provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Governing Body will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

3.5. Designated Governor for Safeguarding

The School governors have appointed a nominated governor for safeguarding to take a lead in relation to responsibility for safeguarding arrangements. The nominated Governor:

- discusses safeguarding matters with the DSL and DDSLs once per term and more regularly if needed;
- liaises directly with the local authority and/or partner agencies where appropriate; and
- undertakes an annual audit of the School's safeguarding procedures and submits a written report to the Governing Body with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the School is making to inter-agency working; and the provision for teaching pupils how to keep themselves safe. This audit will form part of the annual review undertaken by the Governing Body as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

The Designated Governor for Safeguarding is Mrs Kirsty Hillocks.

4. Staff Training

4.1. Whole Staff Training

All staff have a legal duty to protect children from abuse and support them, always acting in the best interest of the child. It is therefore essential that everyone in School:

- is aware of the procedures within this Policy and follows them;
- knows how to implement the procedures in this Policy;
- understands how to record concerns and disclosures and keep sufficient records; and
- reports any matter of concern immediately in accordance with this Policy.

The School ensures that guidance and training is arranged on induction and regular updates at least annually, with comprehensive training every 3 years. Annual training will include refresher guidance on online safety, the Prevent Duty and Female Genital Mutilation.

In addition, safeguarding training is delivered throughout the year at Staff Conference, including discussion of at-risk pupils or current priority safeguarding concerns. All staff have the opportunity to raise children at risk and where necessary actions are agreed.

This will ensure that all staff have the necessary knowledge and skills to carry out their role, and will include (though not exclusively):

- a copy of the School's current Safeguarding (Child Protection) Policy;
- a copy of Part 1 of KCSIE (2022) and, where appropriate, Annex A;
- a requirement to sign to confirm that they have read and understood the above documents;
- knowledge of the role, identity and contact details of the DSL and Deputy DSLs;
- knowledge of the School's policies on Behaviour Management, Anti-Bullying and E-Safety;
- a signpost to the School's 'Monitor Lists' of vulnerable and SEND pupils;
- an understanding of the types of abuse and possible indicators;
- knowledge of how to respond to concerns about a child or a disclosure from a child;
- knowledge of how to manage a report of child-on-child sexual violence and sexual harassment (see child on child Abuse – Section 11 below);
- what to do in the case of concerns about a member of staff (see 'Allegations against staff' – Section 10 below)
- knowledge of the School's Whistleblowing Policy;
- guidance, advice and support on assessing the risk of children being drawn into terrorism and who may be at risk of radicalisation;
- an overview of the local Early Help procedures and an understanding of their role in it; and
- an overview of current specific safeguarding concerns.

Written records of all staff training in Child Protection and Safeguarding are kept.

4.2. Induction Training

All staff are provided with induction training. This will involve staff being provided with (though not exclusively):

- a copy of this Policy, KCSIE 2022 Part 1 and Annex A where relevant;
- training on Online Safety, Female Genital Mutilation and Prevent Duty
- an overview of the role of the DSL/DDSLs and their contact details;
- relevant Child Protection and Safeguarding training including, awareness of local Early Help procedures and the process for making referrals alongside understanding what to do if they are concerned about a child or a child makes a disclosure;
- a signpost to the School's Staff Handbook containing all school policies; a copy of the staff Code of Conduct;
- a copy of the E-Safety and Internet Policy and the Acceptable Use Agreement;
- a copy of the Whistleblowing Policy;
- a copy of the Behaviour Management Policy and Anti-Bullying Policy; and
- a copy of the Procedures in the Event of a Missing Child and the school's safeguarding response to children missing education.

4.3. Educare

All staff are registered with an Educare account as part of their induction to the school. As part of the induction process, all staff are required to complete training modules in:

- Safeguarding Young People
- Child Protection Refresher
- Female Genital Mutilation Awareness
- The Prevent Duty

Opportunities are provided through Staff Conference and during Training Days for staff to complete further modules in safeguarding topics. Course completion rates in safeguarding topics are reviewed and presented at Safeguarding Committee meetings and overall course completion is reviewed at Human Resources, Training and Development Committee meetings.

4.4. DSL/DDSL Training

The DSL and DDSLs undertake training that is in accordance with locally-agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years.

The School arranges its training every two years for DSL and the DDSLs through The Education People – ensuring that it is delivered by representatives of the Kent Safeguarding Children's Partnership. In this way, DSL/DDSLs remain abreast with the specific local picture and local advice, and can meet with the same safeguarding advisers with whom we regularly work. This training includes, but is not limited to, inter-agency work and the Prevent Duty.

Additional specialist training will be provided to those who have specific responsibility for safeguarding or for Looked After Children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by Kent Safeguarding Children Multi-Agency Partnership;
- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
- be able to keep proper written records of concerns and referrals.

5. Kent Inter-Agency Levels of Support

Most children and young people have a number of basic needs that are well supported through a range of universal services. These services include schools, early years education and childcare, health, housing, youth services, leisure facilities and services provided by voluntary organisations. However, some children have more additional or complex needs and may require access to additional, intensive or specialist services to support them.

The information contained within the following section is drawn from the Kent Safeguarding Children Multi-Agency Website.

5.1. Level 1: Universal Support

Universal services are provided to or are routinely available to all children and families. These services are accessed in the local community and delivered by partners including schools, GPs, hospitals, community health services, children's centres, youth hubs, police, fire service and voluntary and community groups.

Below are examples of the indicators that suggest a child would be in level 1.

Children and Young People

- Physically healthy with development checks up to date
- Has an adequate and nutritious diet, regular dental and optical checks
- Attendance at school/School/training above 90%
- No concerns about home/school link
- Able to discriminate between 'safe' and 'unsafe'
- Has a good understanding of right and wrong
- No concerns about child's mental health
- No barriers to learning and no concerns about child's cognitive development
- No concerns about child's behaviours
- Child has a positive sense of self with no concerns about forming relationships
- No concerns about attitude to drugs or alcohol
- No concerns about child's use of technology

Family and Environment

- Stable and affectionate relationships with care givers
- Living in adequate housing in a safe and secure environment
- Good relationships between siblings
- Positive relationships with peers
- Positive sense of self and own skills or abilities
- Child or young person has age appropriate responses in emotions and functions
- Child has developed good early attachments
- Child or young person is able to understand right from wrong and act appropriately
- Child has access to positive activities

Support and Next Steps

To support for a child or family at level 1:

- Discuss any concerns with the family and agree what action is needed. This may be that your service is able to provide some extra support or it may be that you can signpost the family to another agency.

- If the family are requesting support, discuss support required, and if you can access these resources:
    - If you can't access these resources, find out where they can be accessed locally
    - Get the family's agreement to engage with support services.
- Use all your in-house resources before considering involving another agency.
- Check online for other services you can contact locally for support.
- Next steps will depend on the support required. Firstly speak to the family about which professionals or services are already involved with the children and family. Consider GP or health visitor, nursery, school or other education, church, local charity or voluntary or community group.

5.2. Level 2: Additional Support

Children and families with additional needs who require extra help to improve education, parenting, behaviour or to meet specific health needs. These needs can be met by universal services working together or with the addition of some targeted services.

Below are examples of the indicators that suggest a child would be in level 2.

Children and Young People

- Occasional absence or truancy from school
- Potential of becoming NEET
- Missing or absence from home
- Young person presents with low level indicators from the **Child Sexual Exploitation Tool Kit**
- Use of fixed term exclusions
- Poor attachments
- Child is a young carer
- Child is teenage parent
- Concerns about reaching developmental milestones
- Language or communication difficulties
- Has a diagnosed disability or sensory impairment
- Child is associating with peers who are involved in crime or anti-social behaviours
- Low level drug or alcohol use impacting negatively
- Low level mental health or emotional issues or self harm
- Child expressing thoughts of 'running away'
- Disruptive or challenging behavioural difficulties
- Low level offending or anti-social behaviours – at risk of entering Youth Justice System
- Some evidence of risky use of technology or online safety concerns

Parents and Carers

- Families affected by poverty affecting their access to appropriate services/ affecting the child's development
- Parents or carers struggle to meet child's needs, or they place their own needs above the needs of the child
- Parent or carers health including physical/mental/learning disability or substance misuse, impacts negatively on the child's health or development
- Parents or carers struggle to manage child's behaviours
- Poor engagement with Universal Services likely to impact on child's health or development
- Poor supervision provided by parents or carers

- Parents or carers require support to understand child's disability or sensory impairment and strategies to manage

Family and Environment

- Low level drug and/or alcohol misuse
- Low level offending or anti-social behaviours – parents or carers at risk of entering the Criminal Justice System
- Low level or emerging neglect
- Parent was a Child in Care
- Child is affected by difficult family relationships
- Housing in poor state of repair impacting on child's health or development or serious leve l of overcrowding
- **Low level domestic abuse present in the family home**

Support and Next Steps

To support a child or family at level 2:

- Discuss any concerns with the family and agree what action is needed and where the family would like to receive support from
    - Signpost the family or contact the service direct
    - Ensure you have 'agreement to engage' before taking any action.
- Use all your in-house resources before considering involving another agency.
- Check online for other services you can contact locally for support.
- Next steps will depend upon the type of support required. Firstly speak to the family about whom or which services are already involved with the children/family. With agreement other options available may include:
    - The child's school
    - A local group or charity
    - Your **local district council**
    - The School Health Team - **read more about emotional wellbeing and school heath**.
    - Your local **youth hub**
    - Your local **children's centre**.

If you feel the needs of the family sit below Support Levels 3 or 4, and you would have previously considered completing an Early Help Notification, please feel free to contact your local Early Help Team for a District Conversation on the contact details below. Your request for advice will be responded to within 2 working days by an Early Help Manager and you will then be able to discuss the needs of a child, young person or family and be provided with advice about the most appropriate type of support available within the community at Support Levels 1 and 2.

5.3. Level 3: Intensive Support

Intensive support can be offered to children and families where they have complex or multiple needs requiring local authority services to work together with universal services to assess, plan and work with the family to bring about positive change. Includes intensive family support, early help and child in need services.

Below are examples of the indicators that suggest a child would be in level 3.

Children and Young People

- Persistent unauthorised absence from school / NEET
- At risk or has been permanently excluded from school
- Regularly missing from home or school with no explanation
- Significant disabilities
- Serious delay in achieving milestones raising significant concerns
- Teenage pregnancy
- Risky sexual behaviours
- At risk from radicalisation through technology or inappropriate relationships
- Young person presents with medium level indicators from the **Child Sexual Exploitation Tool Kit**
- Domestic abuse, drugs and alcohol issues
- Child subject of a Court Ordered Report under s7 or s37 being completed by children's so cial care
- Children placed under an Education Supervision Order under Section 36 of the Children Act
- Significant dental decay that has not been treated
- Potential of becoming involved in gangs - **read more about gangs**
- Homeless child in need, including 16 17 years old Young Carer whose caring duties are affecting outcomes

Parents and Carers

- Chronic neglect where food, warmth and other basics are often not available
- Inconsistent parenting impairing emotional/ behavioural development of child or inappropriate child care arrangements
- Parent or carer's health/disability/learning difficulty or substance misuse has a direct negative impact on the child
- Parent or carer's own emotional or mental health difficulties have a direct impact on child's health or development
- Parent or carer provides inconsistent boundaries which seriously impacts on the child's development
- Pre-birth assessment required due to concerns
- Parent or carer of disabled child requires support to care

Family and Environment

- Concerns about the level of domestic abuse
- Substance misuse significantly impacting on child
- Risk of homelessness due to relationship breakdown
- Child is privately fostered - **read more about private fostering**
- Neglect issues significantly impacting on the child
- Risk of family breakdown leading to child becoming looked after outside family network
- Child exposed to contact with people who pose a risk to physical or sexual harm to children
- Risk of family breakdown leading to child becoming looked after outside family network
- Family at risk of eviction despite support from EH and/or housing

Support and Next Steps

Kent Children and young people's mental health service provides emotional wellbeing and mental health advice and support for young people and their families across Kent. **Read more about what they do**.

To support a child or family at level 3

- Check your concern meets this support level.
- If you are unsure discuss your concerns with your agency safeguarding lead.
- Get agreement to engage:
- If you have agreement complete the request for support form
- If you don't have agreement it is necessary and good practice to share your concerns with the family and gain their agreement to complete the request for support form
- If you are unsure speak with family about your concerns and the support required and gain their agreement to complete the request for support form
- Check if any previous support has helped, it is helpful to know what has worked well previously, please include this in the information you provide.
- If you need advice speak with your designated safeguarding lead in the first instance.
- The next step is to complete a request for support form if you have the family's agreement to engage.
- If you think the child needs additional support **read about level 4 - specialist support**.

Request for Support Form

You only need to complete a request for support form if you are requesting support at intensive or specialist support levels 3 or 4.

Take care when completing the online request for support form, because the information you provide will be used to assess which is the most appropriate level of support required. If it is not assessed to require support at level 3 or 4, the form will be returned to you so you can consider **universal support level 1** or **additional support level 2** options.

Each child whose Request for Support has been accepted by Children's Social Work Services should have their individual needs assessed - **read about a child and family assessment and what it consists of**.

5.4. Level 4: Specialist Support

Children who are considered to have been harmed or are likely to suffer significant harm as a result of abuse or neglect/ removal from home/or will suffer serious lasting impairment without the intervention of local authority statutory services under high level concern Child in Need (CIN) or high-risk Child Protection (CP) Services and Specialist Youth Justice work. Children whose disability affects all aspects of development.

Below are examples of the indicators that suggest a child would be in level 4.

Children and Young People

- Non-organic failure to thrive
- Sexually inappropriate behaviour
- Sexually aggressive behaviour
- Teenage parent/pregnancy under age of 13 years old
- Sexually transmitted infection in a child under 13 years old
- Physical or sexual abuse including child sexual assault
- Frequently missing from home

- Offending and in the Youth Justice System
- Relationship breakdown or homelessness
- Persistent social exclusion
- Child or young person presenting with several indicators from all categories with one or more high-risk indicators from the **Child Sexual Exploitation Tool Kit**
- Child at immediate risk of significant harm arising from radicalisation, travel to conflict zones, or involvement in terrorist activity
- Gang member or involvement in drug crime - **read more about gangs**
- Child beyond parental control and placing self at risk of significant harm
- Caring for severely or profoundly disabled child has a significant impact on parent/carers ability to meet the child's needs

Parents and Carers

- Parent or carer refusing medical care endangering life or development
- Child left in care of adult known or suspected to be a risk to children or lives in the same house as the child
- Child is left home alone without adequate supervision or support
- Parents unable to restrict access to home by adults known to be a risk to children and other adults
- Parents own needs mean they cannot keep their child or young person safe
- Pre-birth assessment indicates unborn child is at risk of significant harm
- Parents have or may have abused or neglected the child or young person
- Parent or carer has mental health issues, including self-harming behaviour, that present a risk of significant harm to the child
- Parent or carer's domestic abuse and/or substance misuse that presents a risk of significant harm to the child
- Previous child or young person has been removed from parents' care
- Deliberate cruelty or emotional ill-treatment of a child resulting in significant harm
- Concern that a child is suffering or likely to suffer harm as a result of fabricated or induced illness
- Parent, carer or relative is a convicted terrorist, or is subject to counter terrorist police (pursue) investigation, or is a returning fighter from the Middle East - **read more about Prevent and Channel**, the strategies to help stop people becoming terrorists or supporting terrorism.

Family and Environment

- Abandonment or severe neglect
- Emotional abuse including significant harm due to domestic abuse
- Child Sexual Exploitation
- Human trafficking
- Female Genital Mutilation (FGM)
- Forced marriage or honour based violence
- Significant concern about radicalisation

Support and Next Steps

To support a child or family at level 4:

- Check your concern meets this support level.
- If this is a child protection:

- Contact the police straight away if your concern is urgent or the child in immediate danger.
- Next, contact the front door to make a child protection referral. You will be required to complete a request for support form within 24 hours.
- If you are unsure discuss your concerns with your agency safeguarding lead.
- Do not delay, complete a Request for Support Form.

- If this is a Child in Need (CIN) issue:
  - Complete a request for support form
  - If you are unsure, check if you have you identified any issues listed under this support level that are impacting upon the child or family. If there are, complete a Request for Support Form.
  - Check if you have consent, it is good practice to share your concerns and gain agreement. However, **do not delay** completing the form.
  - The next step is to complete a request for support form.

Request for Support Form
You only need to complete a request for support form if you are requesting support at intensive or specialist support levels 3 or 4.

Take care when completing the online request for support form, because the information you provide will be used to assess which is the most appropriate level of support required. If it is not assessed to require support at level 3 or 4, the form will be returned to you so you can consider **universal support level 1** or **additional support level 2** options.

Each child whose request for Support has been accepted by Children's Social Work Services should have their individual needs assessed - **read about a child and family assessment and what it consists of**.

6. Early Help

The School recognises the importance of providing early help to pupils to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, anxiety and relationship issues.

Pupils are encouraged to raise concerns as soon as they are identified, either to their Form Tutor, the Medical and Welfare Manager, any teacher or directly to the DSL or a DDSL, so that effective early support can be provided.

If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, taking into account Kent threshold criteria (see Section 5 above), consider what action should be taken.

If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the pupil's situation does not appear to be improving.

The School has various mechanisms to help identify emerging problems, including the School's pastoral system (including the tutor and house systems), the Medical and Welfare Manager, 'Watchlists' of vulnerable pupils on the School Information System, the training of Mental Health

First Aiders, Wellbeing Days and Worry Boxes. There is also the opportunity at weekly Staff Conferences for any member of staff to raise concerns about pupils or issues. Training Days are used to heighten staff awareness of welfare challenges facing young people and help them identify children who might benefit from early help.

The School recognises the increased vulnerability of young people to whom any or all of the following apply:

- They are disabled or have special educational needs.
- They do not have English as a first language.
- They are looked after children.
- They are acting as a young carer.
- They are showing early signs of abuse or neglect.
- They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these children for a variety of reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- that pupils with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled child's understanding of abuse.

7. What to look for and when to be concerned

All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL or a DDSL.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Staff should be aware of the four main categories of child abuse which are commonly identified:

7.1. Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.

7.2. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 cyber-bullying), 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.

7.3. Sexual Abuse

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

7.4. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 or 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

7.5. Other Types of Abuse

Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation (CSE)
- Child criminal exploitation (county lines)

- Domestic abuse
- Honour-Based Violence (HBV): Female Genital Mutilation (FGM), Forced marriage and Breast Ironing
- Radicalisation
- Children and the court system
- Children with family members in prison
- Homelessness
- Child on child abuse
- Sexual violence and sexual harassment (including 'upskirting')

These are defined more fully in Appendix C and further information is contained in Part 1 and Annex A of KCSIE.

8. Signs of Abuse

Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference;
- a pupil's injury cannot be reasonably or consistently explained, or is unusual in type or location;
- a pattern or frequency of injuries is emerging;
- the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour;
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons;
- the pupil appears neglected (e.g. dirty, hungry, inadequately clothed);
- the pupil appears reluctant to return home or has been openly rejected by parents or guardians;
- the pupil's development is delayed in terms of emotional progress;
- the pupil withdraws emotionally – showing a lack of trust in adults;
- the pupil shies away from being touched or flinches at sudden movements; and
- the pupil loses or gains weight.

Further guidance is provided in Appendix D. Other sources of information on the signs of abuse include the DfE advice note What to do if you're worried a child is being abused (2015) and the NSPCC website.

9. Listening to Pupils and Reporting Concerns

RECOGNISE the signs of abuse
REFER straight to the DSL/DDSL
RECORD accurate notes as soon as possible
RESPOND so the pupil feels reassured and supported

9.1. Listening to a Disclosure

If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen;
- listen carefully to the pupil and keep an open mind - do not interrupt the child or be afraid of silences;
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused;
- reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL or a DDSL as soon as possible and take no further action unless instructed to do so by the DSL or DDSL;
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.

Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible, using CPOMS. The recording must be a clear, precise and factual account of the conversation or observations.

The member of staff should log the concern as a 'Safeguarding Concern' – the DSL or Deputy DSL will then categorise the issue when they action the concern raised.

Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;

- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

9.2. Procedure When Concerned about a Pupil's Welfare

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff, but especially the DSL and DDSLs should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. In practice this simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important to provide as much information as possible as part of the referral process.

If a member of staff has concerns about a pupil's welfare, they must inform the DSL or a DDSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section Allegations against members of staff and volunteers (Section 10 below) should be followed.

All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing using CPOMS.

If in doubt about recording requirements, staff should discuss with the DSL or a DDSL.

When a child is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made by the DSL to Children's Social Care. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

If a pupil is in immediate danger or is at risk of harm, a referral should be made to children's social services and/or the police immediately. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

If a member of staff discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the individual must report this to the police. Unless the individual has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and 'Guidance for Schools' information).

The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's teacher or other member of staff, who will notify the DSL.

Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

9.3. Duties of a DSL when Notified of a Concern

When the DSL or DDSL is notified of any concerns about a pupil's welfare, he will decide on the appropriate course of action. In particular, the DSL or DDSL will decide whether a referral should be made to children's social services.

Factors that the DSL or DDSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- the referral threshold set by the Kent Safeguarding Children Multi-Agency Partnership
- the child's wishes or feelings
- the inter-agency procedures of the KSCMP
- where relevant, local information sharing protocols relating to Channel referrals.

If the DSL decides not to make a referral, but to support the pupil with early help, the DSL will keep the situation under review and consider a later referral to children's social services if the pupil's situation does not appear to be improving. The rationale for decisions and actions by the DSL or DDSL should be recorded in writing at the time that they are made.

9.4. Making a Referral to Children's Social Services

If a pupil is NOT in immediate danger or at risk of suffering harm but is in need of additional support from one or more agencies, the DSL/DDSL will make a referral to children's social services in the Local Authority in which the child lives.

If the initial referral is made by telephone, the DSL/DDSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL/DDSL will contact children's social services again.

If the DSL/DDSL is not sure whether a referral should be made, he/she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately. If the referral is made by a member of staff other than the DSL/DDSL, the DSL should be informed as soon as possible that a referral has been made.

The School is not required to obtain parental consent prior to a referral being made to statutory agencies.

If, after a referral, the pupil's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up and ensure that their concerns are addressed and the pupil's situation improves.

Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.

Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

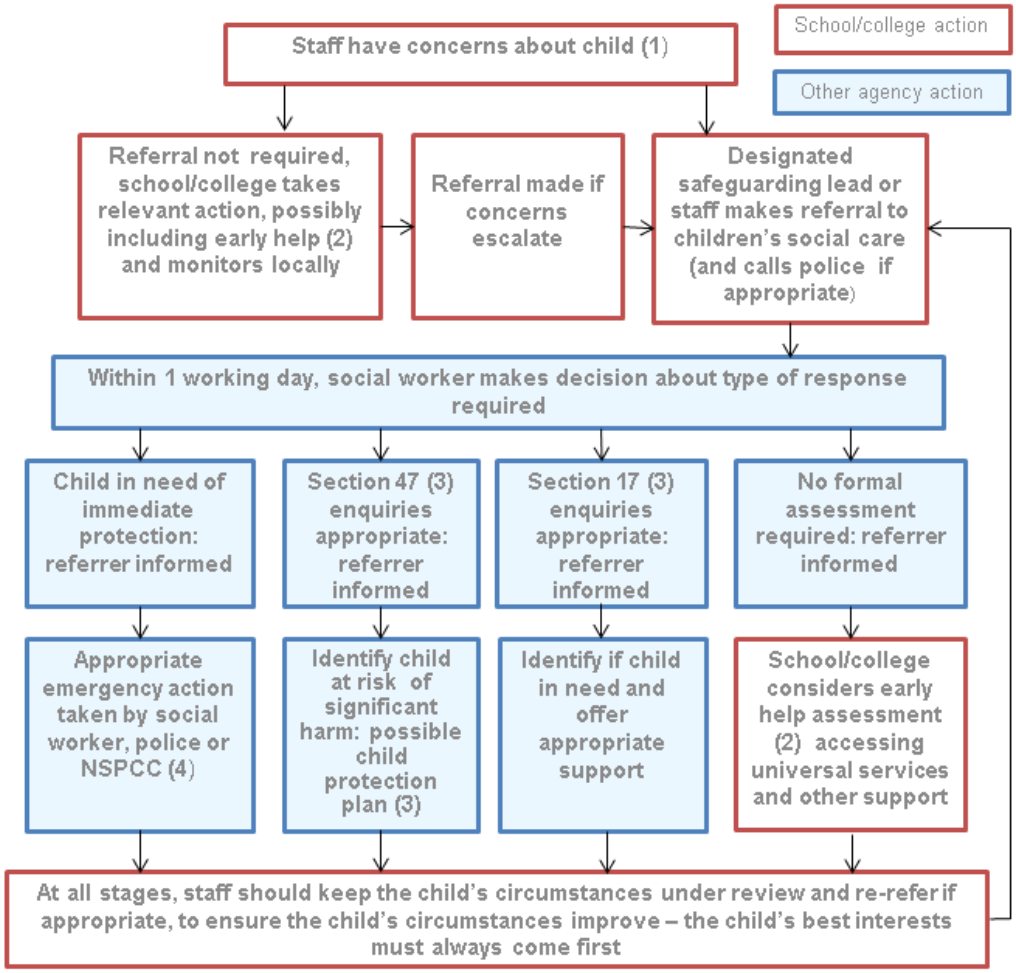
9.5. Informing Parents

Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL/DDSL will need to consult with the Local Authority Designated Officer, children's social services, and/or the Police before discussing details with parents.

For Channel referrals, the DSL/DDSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes.

9.6. Flowchart of Actions When Referring



10. Allegations against Staff, Agency Staff, Contractors or Volunteers

Further information available from Kent County LADO Office publication: *Safeguarding Procedures for Managing Allegations against Staff (Updated May 19)*

10.1. Guidance to Staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their pupils at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct. Specific information about protecting themselves is given in individual staff inductions and in the safeguarding training. Particular care should be taken where staff have one-to-one meetings with pupils.

The following procedures will be used where it is alleged that a member of staff or volunteer 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; or

- behaved towards a child or children in a way that indicates he or she would 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'. This is to take account of situations where a person's behaviour outside school may suggest 'transferable risk'. For example, where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children'

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of KCSIE. September 2022

10.2. Reporting an Allegation about Staff

If an allegation is made about staff that appears to meet the criteria in section 10.1:

- Where an allegation is made about a member of staff, the DSL or volunteer, the matter should be reported immediately to the Headmaster. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.
- Allegations about the Headmaster should be reported to the Chair of Governors, without first notifying the Headmaster.
- Allegations about a governor should be reported to the Chair of Governors.
- The Head, Chairman or nominated safeguarding governor who receives any such allegation is referred to in these procedures as the 'case manager'.

10.3. Low-Level Concerns

Any member of staff or Governor should report low-level concerns to the Headmaster. The Headmaster will be the ultimate decision maker in respect of all low-level concerns especially since only he would be in a position to know whether one low-level concern is part of a broader pattern of concern. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If the Headmaster is in any doubt as to whether the information shared by a member of staff as a low-level concern does in fact meet the harm threshold, he will consult with the LADO.

The School should ensure it creates an environment where staff are encouraged and feel confident to self-refer, where, for example, 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.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the

school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

If the concern has been raised via a third party, the Headmaster (or a nominated deputy) should collect as much evidence as possible by speaking:

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

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

10.4. Action to be Taken by the Case Manager

The case manager will immediately (and in any event within one working day) discuss the matter with the Local Authority Designated Officer (LADO) – the person designated by the local authority to be involved in the management of allegations against people who work with children - before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted.

The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.

Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

10.5. Disclosure of Information

The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.

The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process.

The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

10.6. Investigation

Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the School. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should conducted.

Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.

In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evident to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

10.7. Support

The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.

Support will also be offered to the pupil(s) affected and their parents/guardians. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

10.8. Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of

significant harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.

If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

10.9. Confidentiality

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

10.10. Malicious Allegations

If an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action against the pupil in accordance with the School's Behaviour Management Policy.

If a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the Headmaster or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

10.11. Record Keeping and References

Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be

retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

Allegations that are proven to be false, unsubstantiated or malicious will not be referred to in any reference provided by the School.

10.12. Dismissals and Resignations

If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children, or would have been had the person not resigned, a settlement agreement (sometimes referred to as a compromise agreement) will not be used and a report to the Disclosure and Barring Service will be made promptly and in any event within one month of the person leaving the School.

Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the governors without delay.

If a member of staff, contractor or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible (within one month) if the criteria for referral are met.

If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. The School will follow the advice set out in the TRA documents: Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers to decide whether a referral should be made.

10.13. Allegations against Supply Teachers

Where there is an allegation about a supply teacher, the KCSIE guidance says, 'Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly.' In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome'.

'The school or college will usually take the lead [in any investigation] because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.'

10.14. Use of Gad's Hill for Non-School Activities (Private Hire)

When School facilities are hired or rented out to organisations or individuals and service providers to run community of extra-curricular activities, it is the School's responsibility to ensure that appropriate arrangements have been made to keep children safe.

If the service or activity is under the direct supervision or management of school staff, the School's arrangements for child protection will apply.

However, where services or activities are provided separately by another body, without supervision by school staff, the School will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place, and should inspect these as needed. This applies whether or not the children who attend the service or activity are pupils of the school.

Keeping Children Safe in Out-of-school Settings details the safeguarding arrangements that the School should expect the provider to have in place. As a minimum, the School will expect a provider to have:

- Health and Safety Policy
- Appropriate Risk Assessments
- Appropriate First Aid Training
- Fire Safety Plan
- Safeguarding and Child Protection Policy
- Appropriate Safeguarding Training including an Appointed DSL
- Relevant Pre-Employment Checks for All Staff

If the School receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), then, as with any safeguarding allegation, the School will follow their safeguarding policies and procedures, including informing the LADO as appropriate.

11. Dealing with Child–on-Child Abuse

11.1. Examples of Child-on-Child Abuse

Most instances of pupils causing harm to each other will be dealt with under the School's Anti-Bullying and Behaviour Management Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (sometimes referred to as child-on-child abuse).

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child-on-child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

Pupils with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse.

At Gad's Hill School we have a Zero Tolerance approach to abuse. Child-on-child abuse must never be considered to be 'just banter' or 'just having a laugh'. All staff must demand – and must model themselves – high standards in the way we treat each other. We must never tolerate unacceptable behaviours or use phrases such as 'boys will be boys' or 'part of growing up' as this can contribute to an unsafe environment for children.

11.2. Children Who May Be Particularly Vulnerable

Many factors can contribute to an increased risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens. To ensure that all our children receive full and adequate protection, we give special consideration and attention to any children in our care who are:

- disabled or have special educational needs
- living in an identified domestic abuse situation
- affected by known parental substance misuse
- asylum seekers
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic, neglectful and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of a protected characteristic including race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- not native English speakers i.e. English is not their first language

- 'Looked After' Children (LACs) or children in care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

Additional pastoral support is offered to these children in order to address these challenges through the work of our Inclusion department and any reports of abuse involving children with SEND will require close liaison between the DSL and the Inclusion Lead.

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

11.3. Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexual remarks about a person's clothes or appearance, using sexualised names etc
- Sexual "jokes" or taunting
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), displaying pictures, drawings or photos of a sexual nature
- Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages, including on social media. This type of harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual

violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they **must** ensure it is followed up on. This would usually be by referring the matter to the Designated Safeguarding Lead or a Deputy, but any member of staff can make a referral to Children's Safeguarding Services if they wish (use contact details as in Section 1 above). As is always the case, however, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy), and if they make a referral themselves they should let the DSL know as soon as possible afterwards.

11.3.1. Things to Consider

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. The School should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead is likely to have a complete safeguarding picture and is the most appropriate person to advise on the initial response by the. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- 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
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools should follow general safeguarding principles as set out

throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

11.3.2. Options to Manage the Report

There are four likely scenarios which the School will consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the School will decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

1. Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2. Early help

- In line with 1 above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support.
- Multi-agency early help will work best when placed alongside strong school policies, preventative education and engagement with parents and carers.
- Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).
- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

3. Referrals to children's social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, the School should make a referral to local children's social care.

- At the point of referral to children's social care, the School will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the school (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- The School should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school should be immediate.
- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

4. Reporting to the Police

- Any report to the police will generally be in parallel with a referral to children's social care (as above).
- It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.
- Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage, the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continues to engage with specialist support for the victim and alleged perpetrator(s) as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school takes do not jeopardise the police investigation.
- If the school has questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).
- Whatever the response, it should be under-pinned by the principle that there is a **zero tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

11.4. Preventing Child-on-child Abuse

The School has an important role in developing students' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. All staff should be familiar with the School's Behaviour Management and Anti-Bullying Policies and should also be aware of the importance of:

- enforcing the School's rules which are explicit about the high standards of behaviour and courtesy the School expects
- ensuring that all children know there is an adult in the School whom they can approach if they are worried or in difficulty
- using the School's Monitor List of vulnerable pupils on the SIS to identify those most at risk of child-on-child abuse
- using the Reward & Conduct log on iSams to report incidents of poor behaviour, so that wider patterns can be tracked by tutors, SLT and DSL/DDSLs
- implementing in a consistent way its Behaviour Management Policy
- being clear that sexual violence or sexual harassment is abusive behaviour and is unacceptable and will never be dismissed as 'banter', 'just having a laugh' or 'boys being boys'
- implementing the School's anti-bullying strategy and promoting the School values.

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- providing developmentally appropriate learning opportunities (eg. through SMSC, assemblies, Wellbeing Days) which develop pupils' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to child-on-child abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any students to raise concerns with staff, knowing that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable
- having robust supervision arrangements.

It is important to remember that no (or few) reports of child-on-child abuse do not mean that it is not occurring within the School; it may simply mean that it is not being reported.

11.5. Responding to Allegations of Child-on-Child Abuse

If an allegation of child-on-child abuse has been made the DSL/DDSL must be informed as soon as possible. Where the DSL/DDSL considers that the behaviour meets the local authority threshold criteria, the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved including those accused of abuse.

A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.

If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview.

It is important that both the victim and the perpetrator of child-on-child abuse should be supported. Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other pupils at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors. Children’s social services will independently risk assess the situation and any report produced by them will be used to inform and update the School’s own risk assessment which, in any event, will be reviewed on a regular basis.

11.6. Supporting the Victims and Perpetrators of Sexual Violence and/or Sexual Harassment

11.6.1. The Victim

The school’s initial response to a report from a child is incredibly important. How we respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are 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. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by

reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.

Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

The school should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). The school should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the school should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the school should provide a physical space for victims to withdraw.

It may be necessary for schools and colleges to maintain arrangements to protect and support the victim for a long time. The school should be prepared for this and should work with children's social care and other agencies as required.

It is important that the school do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in their school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or

college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

11.6.2. The alleged perpetrator

The school will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
Advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file.

12. Children Absent from Education for prolonged periods and/or repeated occasions

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. The school will report children that go missing from education to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

Further information is available in Children Missing Education: Statutory Guidance for Local Authorities. (updated 2016). Kent CME team: 03000 412121 or cme@kent.gov.uk

12.1. Admitting New Starters

The law requires all schools to have an admission register and an attendance register. All pupils must be placed on both registers.

Schools must enter pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the school should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.

The School is legally required to notify the Local Authority within five days of adding a pupil's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent he pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency (Note: In line with KCSIE 2022, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.); date of birth; name and address of last school attended (if any).

12.2. Removing a Pupil from the Admissions Register

The School has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a non-standard transition point; i.e., where a compulsory school-aged child leaves the School before completing the School's final year. This notification will be made no later than the point at which the pupil's name is taken off the roll. When this notification is made the School is required to provide the following information: full name of the pupil; name, address and telephone number

of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil's destination school and expected start date; and the reason why the pupil is leaving the School. The School is obliged to make reasonable enquiries alongside the Local Authority to confirm details of the new place of education.

12.3. Absence from School

When a pupil is absent, if the school does not receive a message from a parent or carer, the Attendance Officer will use the parental and emergency contact numbers to endeavour to ascertain the whereabouts of the child. This first attempt at contact will be made before 10am. If the child cannot be traced a DSL/DDSL will be informed at 12pm, who will decide the next course of action. This would usually involve a DSL/DDSL visiting the home address in the first instance, followed by police involvement if contact cannot be established.

See also the School policy Procedures in the Event of a Missing Child for more information.

The school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more.

12.4. Referring a Child Missing in Education

Advice on the Kent referral process for Children Missing Education can be found here: https://www.kelsi.org.uk/pru-inclusion-and-attendance-service-pias/attendance/children-missing-education

A CME Referral should be made to Kent Local Authority in any of the following circumstances:

- Children on roll at a school but missing education: If a child is on a school roll (has a school place), but not attending school and the school's enquiries have failed to establish the child's whereabouts or confirmed an onward destination. Under the Education (Pupil Registration) (England) Regulations 2006, section 5 paragraph 3 'the pupil is a pupil at the school from the beginning of the first day on which the school has agreed, or has been notified, that the pupil will attend the school. All children that have been offered a start date to attend your school/academy, must be put on roll on the expected start date, even if they fail to attend.
- If a child is offered a school place and does not arrive on the agreed start date and the school's enquiries has failed to establish the child's whereabouts.
- If the child is leaving your school at point of transition but doesn't have a confirmed destination.
- Children without a school place: If a school or an agency has identified a child not being on roll, they must notify KCC using the Digital Front Door.

13. EYFS-Specific Safeguarding

13.1. Specific Arrangements in EYFS

The School EYFS Department ensures that the Safeguarding Policy which applies to the rest of the school also applies to the EYFS. We are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential. Children learn best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them.

The separate EYFS Policy provides further details.

The following arrangements are in place for the School's EYFS setting:

- The EYFS Manager is a DDSL with responsibility for safeguarding children, including liaison with local children's services as appropriate, and who has undergone appropriate child protection training, which is refreshed at least every two years.
- We allocate a key person to each child to ensure that every child's care is tailored to meet their individual needs, to help the child become familiar with our setting and to offer a settled relationship for the child and parent.
- The EYFS Manager conducts termly supervision sessions with EYFS staff to provide opportunities to discuss any issues, particularly concerning children's development or wellbeing, including child protection concerns.
- In order to maintain the child's privacy, the majority of intimate care incidences will take place on a one-to-one basis and wherever possible will be supported by the child's key person. The first aid treatment that will be conducted by a Paediatric qualified First Aider or Medical and Welfare Manager. However for the safeguarding of all Foundation staff individual intimate care will not be undertaken without a Foundation Stage colleague/Form Tutor being aware of its occurrence.
- We fully comply with the ratio and qualification requirements applicable to each age range of children in keeping with the Statutory Framework for EYFS.
- All our paediatric first aid training is relevant for workers caring for young children.
- We ensure that our premises, including floor space and outdoor spaces, are fit for purpose and suitable for the age of our children cared for, and the activities provided on the premises.

13.2. Use of Mobile Phones, Smart Watches, Cameras and other Devices in EYFS

- Each EYFS classroom has the use of an iPad which should be easily accessible to capture spontaneous moments to support the observation requirements of Early Years Foundation Stage and to share/communicate the children's learning and development with parents. The EYFS Manager/ Form Tutor are responsible for overseeing this.
- Images of children must only be taken when they are in full and suitable dress in a classroom, Early Years orchard, school grounds, hall or on a school trip.

- Images will only be used for the EYFS Profiles, EYFS notice boards; EYFS display boards, School Newsletters, publicity or the School website – with the written permission of the parents.
- Photographs are not permitted to be taken or used for any other purpose.
- Children's use of digital cameras/iPads in the Early Years department only takes place with direct supervision by staff.
- The photographs on camera memory cards or other storage devices should be deleted at the end of each academic year.
- Use of mobile phones, smart watches and personal devices must be restricted to staff breaks in child free areas unless agreed by the Designated Safeguarding Lead in the EYFS.
- All staff must ensure, when using a mobile phone or other personal device, that no children are present in the room or outside whilst the phone or personal device is being used.
- Any authorised use of mobile phones, smart watches or device whilst children are present must be monitored and recorded in the Social Contact Log on the School Information System.
- EYFS staff mobile telephones and smart watches will be stored appropriately. In KN they will be stored in a locked filing cabinet in the KN office. In KR they will be stored in the staff room or the KG office.
- Staff must not use their own personal accounts for contacting parents or carers. All phone calls/text messages /emails must go via iSams, School email or other school-operated communications systems If, in an emergency, the use of a personal phone for this purpose is considered to be essential, it should be recorded in the Social Contact Log as soon as is practicable after the event.
- The camera/video recording or audio recording functions on mobile phones are also prohibited.
- Parents are not permitted to use any photographic or recording device in the Foundation Stage setting without the prior consent of the Headmaster/Head of Kindergarten and Junior.
- EYFS Manager and Head of Kindergarten will stipulate and monitor the use of mobile phones and smart watches on trips.

14. Other Safeguarding Arrangements

14.1. Teaching Children to Stay Safe

The Governing Body and DSL/DDSLs ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through assemblies, form time and SMSC lessons as well as in other areas of the curriculum.

The School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship. It is expected that all curriculum group leaders and teachers will consider the opportunities that exist in their area of responsibility for ensuring the curriculum will be used to build resilience,

including to radicalisation, help pupils to keep safe and to know how to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils will be taught, for example;

- to recognise and manage risks in different situations and then decide how to behave responsibly
- to judge what kinds of physical contact are acceptable and unacceptable
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help
- to use assertiveness techniques to resist unhelpful pressure
- emotional literacy.

14.2. The Use of Mobile Phones and Cameras

Further information on the use of personal devices and social media accounts can be found in both the Staff Code of Conduct and the E-Safety Policy and Acceptable Use Agreement. Specific arrangements for the use of these in the EYFS setting can be found in the EYFS specific (section 13 above). Pupil use of mobile phones and other network-enable technology is covered in detail in the School's Behaviour Management Policy.

All members of staff are to be vigilant and report concerns regarding the use of mobile phones, cameras, smart watches and personal devices. The Code of Conduct for staff makes clear that they should not use personal devices to take or store pictures or video of children, nor should they give their personal phone numbers or social media contact details or use these accounts to communicate with parents or children. If, in the judgement of the member of staff, there is an overriding safeguarding reason to do the above (eg. in an emergency on a trip) then the act should be logged on the Social Contact Register.

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school-organised activities with the prior consent of the school and then only in designated areas. At school concerts, shows and other similar productions, parents are reminded not to post photos or videos on social media if they contain images of other people's children.

If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

14.3. Risk Assessment

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole School, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual pupils or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the Health and Safety Policy.

14.4. Safer Recruitment

Gad's Hill School is committed to a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children. All suitable checks are carried out to ensure that all staff working within our School, who have substantial access to children, have been checked as to their suitability, including verification of

their identity, qualifications, a satisfactory DBS check and where necessary a barred-list check (according to guidance), and that a single central record is kept for audit purposes. For those working with EYFS children and those working with children between 5-8 years old, outside of normal school hours, a disqualification from working with children declaration is also completed.

The School's separate Staff Recruitment Policy contains further details about how the process of staff recruitment is conducted.

14.5. The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to Gad's Hill School's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

Risk assessment
For pupils who are identified as being at risk of radicalisation, the school will need to consider the level of risk, to identify the most appropriate referral, which could include Channel or Children's Social Care.

Although decisions to seek support for a child about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

There is no single way of identifying who is likely to be vulnerable. Risk factors may include:

- Peer pressure
- Influence from other internet users
- Bullying, crime and anti-social behaviour
- Family tensions
- Race/hate crime
- Lack of self-esteem or identity
- Personal or political grievances

The School works with the Local Authority, who provide contextual information about the area, allowing the School to assess the risk of pupils being drawn into terrorism, including extremist ideologies

Working in Partnership
The Prevent duty builds on existing local partnership arrangements. For example, the Governing Body ensures that safeguarding arrangements take into account the policies and procedures of the Kent Safeguarding Children Multi-Agency Partnership. Effective engagement with parents / the family is also considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. The Schools discusses any concerns in relation to possible radicalisation with a child's parents in line with general safeguarding procedures unless they have specific reason to believe that to do so would put the child at risk.

Staff training
Regular training enables staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas. Educare training in the Prevent Duty is a required part of the induction programme for all new colleagues.

E-Safety Policy
The E-Safety and Internet policy and Acceptable Use Agreement provide guidance to pupils as to how to stay safe online and sets out the filtering and monitoring mechanisms in place. Impero monitoring software filters and reports use of key words related to extremism and radicalisation on all pupil and staff machines. The effectiveness of our filtering and monitoring systems is regularly reviewed at Governor-led Safeguarding Committee meetings, of which the Network Manager is a permanent member.

If you have a concern that someone is either moving towards support for terrorism, or an attraction to terrorism or a vulnerability to radicalisation, please inform the DSL who will assess the situation and if necessary refer the matter to: Kent Channel Coordinator at channel@kent.pnn.police.uk. Staff may also contact 101 (the non-emergency police number) or Kent Police via 01622 690690 or the dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

14.6. One-to-One Staff/Pupil Arrangements

Members of staff and volunteers need to be aware that unwary actions can be misconstrued as unprofessional conduct. To avoid misunderstandings the following should be adhered to carefully:

- One-to-one meetings should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door
- When in a private meeting with a child or one-to-one session as occurs, for example, with the Medical and Welfare Manager, ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured, unless this is detrimental to the privacy of the pupil
- One-to-one tuition for example in music, performing arts or sports coaching should be carried out in view ie. via a door with a glass panel and essential body contact when instructing fine position of play must be strictly professional. Closed circuit cameras operate in music practice rooms and Learning Support department classrooms where one-to-one tuition happens as a matter of course.

14.7. Visiting Speakers

The person responsible for the speaker is the member of staff in charge of the event. The content of the talk will be agreed prior to the event to ensure that fundamental British values are upheld.

The visiting speaker will be asked to bring proof of ID (driving licence for example) with him/her. The Prevent statutory guidance requires that any visiting speakers who might fall within the scope of the Prevent duty, whether invited by staff or pupils, are suitable and appropriately supervised. The school will risk-assess each case on its own merit and conduct checks that are proportionate to the perceived risk. This could mean that even in cases where

specific vetting checks are not prescribed, for example, if speakers will not be left alone with pupils, the school may conduct an internet search on the visitor's background and profile or conduct a barred list check.

As with all other visitors the speaker will sign in on arrival, reception staff will check their ID and will draw their attention to the safeguarding information at the reception and on their visitor's badge. Visiting speakers will be escorted whilst on site and will sign out on departure. A record will be kept by the Headmaster's PA of all visiting speakers (i.e. name, introduced by, subject, checks carried out).

When a visiting speaker presents views which may be seen to give one side of an argument on a contentious issue, efforts will be made to arrange for speakers to present other viewpoints, or members of staff will act to ensure that those other viewpoints are addressed and considered by pupils alongside those expressed by the speaker.

14.8. Confidentiality and Information Sharing

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a pupil who is subject to a child protection plan is moving to another school, the DSL will ensure their safeguarding file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis.

Further non-statutory guidance Information Sharing was published by the Government in July 2018. See Appendix F.

14.9. Whistle-Blowing

The school has a culture of safety and of raising concerns. It has a culture of valuing staff and of reflective practice. The Whistle–Blowing Policy outlines the procedures for reporting and handling concerns, including about poor or unsafe practice and potential failures in the school's

safeguarding regime, provision for support, mediation and dispute resolution where necessary. At induction, staff members have training to inform them of our whistle–blowing policy. This is revisited every three years when child protection update training is conducted. Concerns will be received and handled with transparency and accountability.

Where a staff member feels unable to raise an issue with the Headmaster/DLS or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at: Advice on whistleblowing.
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Any member of staff can whistle-blow without fear of detriment (retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

14.10. Premises and Security

The School will take all practicable steps to ensure that premises are as secure as circumstances permit. This includes:

- Code and/or card access control to buildings throughout School
- Visitor access control procedures
- CCTV at various points around the campus
- Lockdown procedures
- Security lighting

Further details can be found in the School's Health and Safety Policy.

14.11. Host Families

The School may make arrangements for exchange visits which enrich the curriculum and may provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages. The School has a responsibility for the safety and welfare of children during any exchange visit they arrange and for considering how best to minimise risk of harm to those children involved. This would include when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

School arranged homestay – suitability of adults in UK host families
When arranging a homestay, schools should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

In circumstances where the School arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the

School has the power to terminate such a homestay the School would be the regulated activity provider. A regulated activity provider commits a criminal offence if it knows, or has reason to believe that, an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity. It should be noted that where the child's parent(s) or a student themselves arranges their own homestay, this would be a private arrangement therefore the School would not be the regulated activity provider.

Whilst there is no legal requirement for schools or colleges, as regulated activity providers to check the barred list status of an adult who will provide homestay (in the circumstances described above), the School should obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but will also allow the School to consider whether any criminal record information shown on the certificate would indicate the adult was an unsuitable host for a child.

In addition to those engaging in regulated activity, schools may choose to also obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Homestay – suitability of adults in host families abroad
It is not possible for schools and colleges to obtain criminality information from the DBS about adults who provide homestays abroad. The School should liaise with partner schools abroad or an organising company, to establish a shared understanding of the arrangements in place both before and during the visit. They should also satisfy themselves that these are appropriate and sufficient to safeguard effectively every child who will take part in the exchange.

15. Monitoring this Policy

- This policy will be subject to continuous monitoring, refinement and audit by the DSL and DDSLs, and by the Governor-led Safeguarding Sub-Committee.
- The Board of Governors will consider safeguarding issues at every board meeting and will undertake **an annual review** of this policy and of the efficiency with which the related duties have been discharged, or earlier if changes in legislation, regulatory requirements or best practice guidelines so require. The Board should also ensure that the school contributes to interagency working through effective communication and good cooperation with local agencies.
- The Governing Body recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy via the safeguarding committee.
- All staff and volunteers are given the opportunity to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and that such concerns will be taken seriously by the SLT.
- If there has been a substantiated allegation against a member of staff, the school should work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice.

APPENDIX A: DSL Job Description

Job description for the Designated Safeguarding Lead (DSL and DDSLs)	
The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment	
Summary of the role	• To take lead responsibility for safeguarding and child protection (including online safety) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise. • To have the status and authority within the School to carry out the duties of the post including committing resources, and where appropriate, supporting and directing other staff to safeguard and promote the welfare of students. • Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.

	• To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of students. • To promote and safeguard the welfare of students in the School, including online.
Main duties and responsibilities	***Further specifics:***
Managing referrals	You are expected to: • refer cases of suspected abuse of any student at the School to the local authority children's social care; • support staff who make referrals to local authority children's social care; • refer cases to the Channel programme where there is a radicalisation concern; • support staff who make referrals to the Channel programme; • refer cases where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (**DBS**); and • refer cases where a crime has been committed to the Police.
Work with others	You are expected to: • act as a point of contact with the three safeguarding partners: the local authority (Kent); the clinical commissioning group; and the police; • liaise with the Principal to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; • as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child protection concerns in cases which concern a staff member; • liaise with staff (especially pastoral support staff, IT staff, First Aiders, and the named persons with oversight for SEND) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and • to act as a source of support, advice and expertise for all staff.
Training	You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training. In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role in order to: • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements; • have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference

	and be able to attend and contribute to these effectively when required to do so; • ensure each member of staff has access to, and understands, the School or School's child protection policy and procedures, especially new and part-time staff; • be alert to the specific needs of children in need, those with special educational needs and young carers; • understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; • understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners; • be able to keep detailed, accurate, secure written records of concerns and referrals; • understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation; • be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School; • be able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
Raising awareness	You are expected to: • ensure that the School's child protection policies are known, understood and used appropriately; • ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this, • ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
Keeping children safe online	You are expected to: • Act as the main point of contact on all online safety issues • Ensure relevant policies are in place to mitigate or handle online safety concerns

	• Record online safety incidents and actions taken • Ensure the school community understands what safe and appropriate online behaviour is and the sanctions for misusing the Internet • Ensure the School's filtering and monitoring systems for IT are fit for purpose and follow published guidance (https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges) and that all staff receive appropriate safeguarding training which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. • Implement online safety training for all safeguarding staff • Actively encourage positive online behaviour • Ensure online safety education is embedded throughout the curriculum and empowers children to keep themselves and others safe online • Promote online safety to parents and carers • Refresh their training at regular intervals, at least annually • Keeping updated with current research legislation and trends
Child protection files	You are expected to: • ensure that when a student leaves the School their child protection file is transferred to the new school or college as soon as possible; • ensure child protection files are transferred separately from the student's main file in a secure manner and confirmation of receipt is received from the destination school or college; • consider whether it is appropriate to share any information with the new school or college in advance of the student leaving
Availability	You are expected to: • ensure during term time either the Designated Safeguarding Lead (or a deputy) will always be available to discuss any safeguarding concerns; and • Arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

APPENDIX B: Safeguarding Concern Form

NB: From September 2023, staff will be required to use CPOMS to report safeguarding concerns to the DSL and deputy DSLs. This online recording system will replace the use of the Safeguarding Concern Form – although for a period of time in the autumn term 2023, copies of the yellow Safeguarding Concern Form will remain available in staff rooms to ensure no referrals are missed while transitioning to CPOMS.

RECORD FORM
Safety & Welfare Concern Form

Name(s) of pupil(s):

Form:

Date of concern/incident (DD/MM/YY):

Nature of the concern/incident (who/what/where/when):

Any other relevant information (witnesses/immediate action taken):	
Name of member of staff: Role:	Date form completed:

Action taken (including reason for decisions) and outcomes (DSL only)

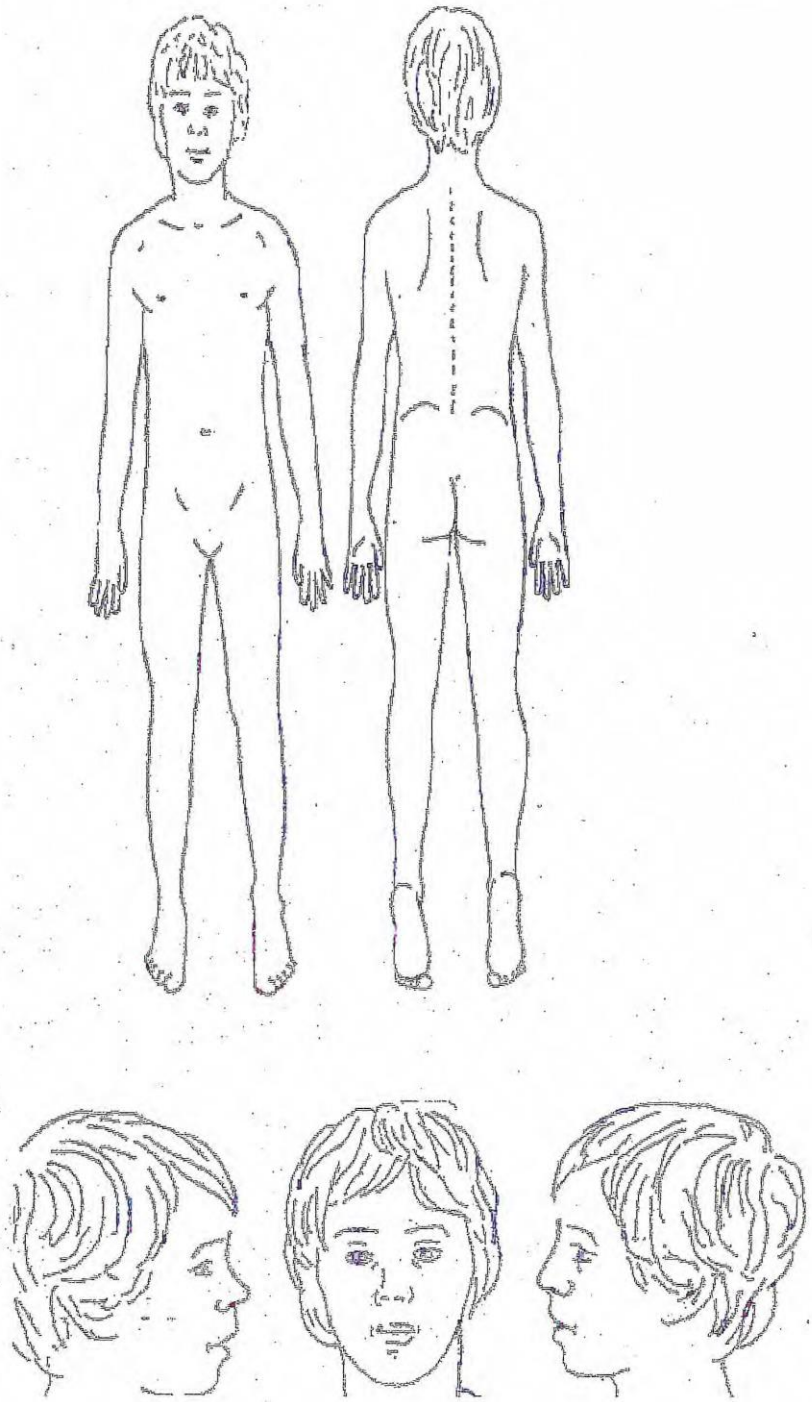
Signature of DSL:	Date:
Signature of Lead DSL: (if appropriate)	Date:

Please return the completed form to the DSL (CG/DM/VG/GC/JT/PS) as soon as possible.

CONFIDENTIAL

Pupil's Name: **Date & time observed:**

Observer's Name:

Body map and description of marks


APPENDIX C: Other Types of Abuse

Child abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.
It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:
http://www.actionagainstabduction.org and www.clevernevergoes.org.

Children missing from education

All children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education is a potential indicator of abuse or neglect, including possible sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to prevent the risks of a child going missing in future. The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the pupil.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. 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. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

County lines and Child Criminal Exploitation (CCE)

'County lines' is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines'. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. Victims are recruited using intimidation, deception, violence, debt bondage or grooming. During this process the 'victims' are likely to commit criminal offences. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, and local government agencies.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police

programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where 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.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Domestic abuse

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. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.'

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

The School is part of Operation Encompass, a scheme which alerts education providers of domestic abuse reports made to the police which affect pupils within the school. Information shared as part of Operation Encompass is logged in pupil safeguarding files and procedures for monitoring vulnerable pupils will be put in place.

Forced marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Honour-Based Violence (HBV)

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and illegal in the UK and should be handled and escalated as such.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is

known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

All staff must be aware of the law requiring teachers to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Rise Above for links to all materials and lesson plans.

Online Safety

For further information, please see the separate E-safety Policy

Note that the E-Safety Policy has been updated to reflect changes to *Meeting digital and technology standards in schools and colleges* and in line with changes in *Keeping Children Safe in Education, September 2023.*

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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 (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

Pupils are not permitted to have mobile phones or other network enabled devices in their possession during school hours (see School Rules). This restricts (but does not entirely eliminate) the risk that some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

It is important to remain vigilant to the growing use of a variety of smart technologies that enable pupils to have unlimited and unrestricted access to the internet via mobile phone networks, which they may abuse to sexually harass their peers, share indecent images consensually and non-consensually and view harmful content. For example, pupils are required to turn their phones off when placing them in storage in school, preventing them from using them as hot spots for other devices.

It may be necessary for the majority of pupils to be required to switch to remote education, perhaps for extended periods of time and the School will share timely resources with pupils and parents on how to remain safe online. During periods of remote education the school will be in regular contact with parents and these communications will be used to reinforce the importance of children being safe online and parents are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents to be aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Radicalisation and extremism

'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging
- a desire for 'adventure' and excitement
- a desire to enhance self-esteem of the individual and promote 'street cred'

- the discovery of and identification with a charismatic individual and, through them, attraction to a group
- which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL. On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. The Channel programme is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

Self-Harm

What is self-harm?

Self-harm is increasingly recognised as an issue schools have to deal with and therefore it is important that all Gad's Hill staff have a general understanding of self-harm, signs to look out for and what to do if they become aware that a pupil is self-harming.

We all act in ways on occasion that could be considered as harmful to ourselves. Self-harming is when someone chooses to inflict pain on themselves in some way. It includes, but is not limited to cutting, overdosing (self-poisoning), hitting, burning or scalding, pulling hair, picking or scratching skin, self-asphyxiation, ingesting toxic substances, fracturing bones. Some young people harm themselves in less obvious, but still serious ways such as taking drugs, having unsafe sex, binge drinking or starving themselves. It is usually a sign that something is wrong.

It can feel to other people that these things are done calmly and deliberately – almost clinically. But we know that someone who self-harms is usually in a state of high emotion, distress and unbearable inner turmoil. Some people plan to self-harm in advance, for others, it happens on the spur of the moment.

Some people self-harm only once or twice, but others do it regularly - it can be hard to stop.

What self-harm is not

- Attention Seeking

For many children and young people self-harm is a way to communicate emotional distress. Self-harm is a behaviour, and behaviours are a way of communicating feelings. Therefore self-harm is one way of communicating high levels of distress and is often an expression of need for hard–to manage feelings to be validated and understood.

However, like any behaviour, self-harm may be used to seek help for unmet needs. It is important to understand what these needs are and how they might be met. It is important to remember that the needs are legitimate; the young person may need to find more functional ways to get them met. It could be that there is a problem at home, an issue of bullying, and they feel no one is listening to them or hearing them.

- Cultural norms

There is not one 'type' of person who self harms. Some groups are more vulnerable than others but each case is individual. Whilst self-harm may be used to attract attention to unmet needs, self-harm is not about seeking attention per se. It is not a way of fitting in. These sort of prejudices and misconceptions about self-harming behaviour may lead people to believe they 'know' who self-harms and why. However, each person is unique and will have found the practice of self-harm by their own route, and rely on it at times of stress due to the release and relief it offers them.

Warning Signs

There may be no warning signs, and often people who self-harm go to great lengths to conceal their injuries so it can be hard to know for sure if a person does self-harm. If you notice any change in a child or young person that concerns you it is important to open up a conversation with that child or young person. A change in their behaviour, attitudes or presence at school (are they absent or not engaging, which is unlike them) can be significant and should be followed up.

Intervention and Response

If a member of staff discovers or is informed of a self-harm incident, they should follow this process:

1. Ensure that you and the pupil are safe in the immediate circumstances.

- If the pupil has an implement used for self-harm, ask them to give it to you (but exercise caution if taking a sharp item).
- If you are concerned that the pupil may imminently seek to harm themselves again:
    - Call 999 if you consider that there is imminent risk of physical harm to anyone.
    - Try to summon a nearby member of staff or move the pupil to an area where there is likely to be a second member of staff.
    - Call Reception (205) and ask for the DSL or a Deputy DSL to be alerted.

2. Assess whether the pupil requires immediate medical care:

- If there is heavy bleeding, a suspected overdose or the pupil is unconscious, the member of staff should call 999 for an ambulance immediately.
- If there is a minor wound or other injury, first aid should be administered either by the nurse at the medical room or by the member of staff using first aid kits located around the school site (or carried with staff on a trip off-site).

3. Reassure the pupil.

- Remain calm and non-judgemental at all times.
- Do not make promises you cannot keep, particularly regarding confidentiality.

4. Inform DSL or DDSL as soon as possible.

- Completing a yellow slip is important, but this might be deferred if necessary in the interests of a timely referral to a safeguarding lead.

Follow-up actions by the DSL or DDSL

1. Ensure all relevant information about the incident has been gathered.

2. Assess the degree of intent and risk of further self-harm:

- From 'plea for assistance' to 'determined attempt to die'
- Is the self-harm a coping mechanism for the child, and if so how will we support them to cope in other ways?
- Issues to consider:
    - How long has the pupil been thinking about self-harming?
    - Was the act impulsive or part of a long standing plan?
    - What were they thinking at the time of the event?
    - What did they expect to happen as a result of the event?
    - What other vulnerabilities (eg. trauma, life events, family, social and cultural factors) affect the self-harming behaviour?

3. Ensure that parents are informed.

- This will always be the course of action taken unless there is a genuine concern that the pupil will be at a greater risk if parents are informed. In that case, a referral should be made via the Kent Children's Services Integrated Front Door.

4. Consider that services might need to be involved:

- Internal school support – via nurse or Inclusion team
- CAMHS/GP
- Kent Children's Services

5. Share information more widely as appropriate.

- Create a 'Team around the Child' involving relevant staff members: form tutor, nurse, inclusion team, DSLs. Make sure all relevant information is shared within this team.
- Consider information that might need to be shared on monitoring lists or safeguarding log

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include 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 criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

Youth produced sexual imagery

While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images, both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. The DSL should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- has created and shared sexual imagery of themselves with a peer under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person; or
- is in possession of sexual imagery created by another person under the age of 18.

Staff must not ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. You should not view youth-produced sexual imagery unless there is good and clear reason to do so. Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people *(New advice - December 2020 – replacing previous sexting guidance)*

A decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the School's pastoral support and disciplinary framework and, if appropriate, local network of support.

APPENDIX D: Further Information on Signs of Abuse

Physical abuse

Physical signs	Behavioural signs
Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggest the use of an instrument Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks Scald marks –immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child Human bite marks Broken bones	Behavioural extremes (withdrawal, aggression or depression) Unbelievable or inconsistent explanations of injuries Fear of parents being contacted Flinching when approached or touched Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
Eating disorders, including obesity or anorexia Speech disorders (stammering) Nervous disorders (rashes, hives, facial tics, stomach aches)	Fear of parent being approached Fear of making mistakes Developmental delay in terms of emotional progress Cruel behaviour towards children, adults or animals Self-harm Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitable

Sexual abuse

Physical signs	Behavioural signs
Torn, stained or bloody underclothes Pain or itching in genital area Bruises or bleeding near genital area or anus Sexually transmitted infections Pregnancy Discomfort when walking or sitting down	Self-harm Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level Sudden or unexplained changes in behaviour Avoidance of undressing or wearing extra layers of clothing Truancy Regressive behaviours (bed-wetting or fear of dark)

Neglect

Physical signs	Behavioural signs
Height and weight significantly blow age level Poor hygiene (lice, body odour etc) Inappropriate clothing for weather conditions Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) Constant hunger, sometimes stealing food from others	Erratic attendance at School Chronic hunger or tiredness Having few friends Assuming adult responsibilities

Child sexual exploitation

Physical signs	Behavioural signs
Tiredness or mood swings Bruising Sexually transmitted diseases Pregnancy	Sudden decline in School performance, punctuality, attendance In possession of expensive goods Going to place they cannot afford Age-inappropriate clothing Inappropriate sexualised behaviour Secretive Mixing with older people Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
See sections on physical and sexual abuse Carrying weapons	Self-harming Persistently going missing from School or home and/or being found out of area Unexplained acquisition of money, clothes or mobile phones Excessive receipt of texts/phone calls and/or having multiple handsets Relationships with controlling older individuals or groups Significant decline in School performance Gang association or isolation from peers or social networks

Female genital mutilation

Physical signs	Behavioural signs
Difficulty walking, sitting or standing Bladder or menstrual problems Severe pain and bleeding Infections such as tetanus, HIV and hepatitis B and C	Abroad for a prolonged period Unusual behaviour after a period of absence May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
Cut or shaved hair as a form of punishment for being disobedient	Absence from School Failure to return from visit to country of origin Self-harm or attempted suicide Running away from home Early marriage of siblings Sudden announcement of engagement to a stranger May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Grooming

For further advice on grooming please refer to the information here:
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/

Physical signs	Behavioural signs
See section on sexual abuse	Secretiveness about who they are talking to online and what sites they visit Possession of electronic devices such as mobile phones or webcams that parents have not provided Engaging less with their usual friends Using sexual language that you would not expect them to know

	Going to unusual places to meet people Using drugs and/or alcohol Going missing from home or School

Radicalisation

Physical signs	Behavioural signs
Out of character changes in dress, behaviour and peer relationships	Showing sympathy for extremist causes Glorifying violence Evidence of possessing illegal or extremist literature A sudden disrespectful attitude towards others Increased secretiveness, especially in relation to internet use Unwillingness or inability to discuss their views Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

APPENDIX E: Government Guidance Links

Keeping Children Safe in Education (September 2022)

Working Together to Safeguard Children (2018)

NEW: NPCC – When to Call the Police: Guidance for schools & colleges

Abuse:

What to do if you are worried a child is being abused
Faith based abuse: National Action Plan
Domestic abuse: Various information / Guidance
Relationship abuse: disrespect nobody

Bullying:

Preventing Bullying

Children and the courts:

Advice for 5 to 11 year old witnesses in criminal courts
Advice for 12 to 17 year old witnesses in criminal courts

Children missing from education, home or care:

Children missing education
Children missing from home or care
Children and adults missing strategy

Children with family members in prison:

National Information Centre on Children of Offenders

Child exploitation:

Child sexual exploitation: guide for practitioners
Trafficking: safeguarding children
County Lines: criminal exploitation of children and vulnerable adults

Drugs:

Drugs: advice for schools
Information and advice on drugs: Talk to Frank

So-Called Honour Based Violence:

Female Genital Mutilation: information and resources
Female Genital Mutilation: multi-agency statutory guidance
Forced marriage: statutory guidance and government advice

Health and wellbeing:

Fabricated or induced illness: safeguarding children
Medical conditions: supporting pupils at school
Mental health and behaviour

Online:

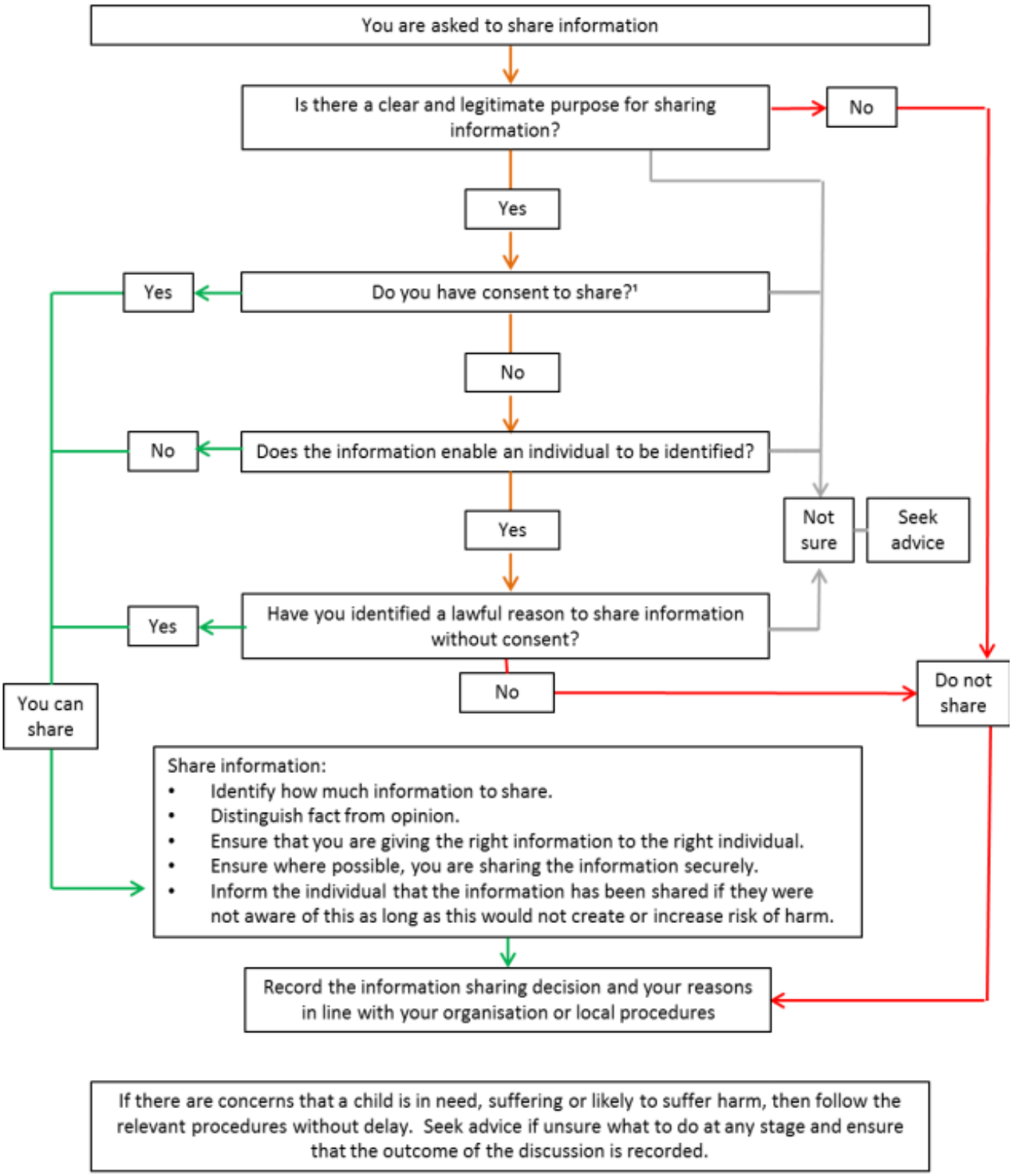
Teaching online safety in schools
Harmful online challenges and online hoaxes
Sexting: responding to incidents and safeguarding children
Sharing Nudes and Semi Nudes: Advice for education settings

Radicalisation:

Prevent Duty guidance
Prevent Duty advice for schools
Educate Against Hate website

Violence:

Gangs and youth violence: advice for schools and colleges
Ending violence against women and girls 2016 to 2020 strategy
Sexual violence and sexual harassment between children in schools and colleges

APPENDIX F: Flowchart of When and How to Share Information

Information Sharing: advice for practitioners providing safeguarding services to children (July 18)