



The Golden Thread Alliance

Safeguarding and Child Protection

Policy

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

Approved by:	Board of Trustees
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Last reviewed on:	September 2025
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Next review due by:	September 2026
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Important contacts

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Trust Safeguarding & Attendance Lead	Debbie Clarke-Basrai	Debbie.clarke-basrai@golden-thread.org
School Improvement Partner for Teacher Development	Sarah Heaver	Sarah.heaver@golden-thread.org

Culverstone Green Primary School

ROLE	NAME	CONTACT DETAILS
Headteacher/Lead DSL	Charlotte Casey	charlotte.casey@golden-thread.org
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Deputy DSL	Vicky Brown	victoria.brown@golden-thread.org
Deputy DSL	Carmela Sherress	Carmela.Sherress@golden-thread.org
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Fleetdown Primary Academy

ROLE	NAME	CONTACT DETAILS
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ROLE	NAME	CONTACT DETAILS
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Link Safeguarding Governor	Bradley Journet-Exon	Bradley.journet-exon@golden-thread.org

Meopham Community Academy

ROLE	NAME	CONTACT DETAILS
Headteacher /Deputy DSL	Thomas Waterman	thomas.waterman@golden-thread.org
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Deputy DSL	Sarah Dean	Sarah.dean@golden-thread.org
Deputy DSL	Daniel Taylor	Daniel.taylor@golden-thread.org
Deputy DSL	Paula Martin	Paula.Martin@golden-thread.org
Link Safeguarding Governor	Adam Russell	Adam.Russell@golden-thread.org

Oakfield Primary Academy

ROLE	NAME	CONTACT DETAILS
Headteacher / Deputy DSL	Rajinder Kaur-Gill	Rajinder.kaur-gill@golden-thread.org
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Deputy DSL	Julia McCloskey	Julia.mccloskey@golden-thread.org
Deputy DSL	Claire Allen	Claire.allen@golden-thread.org
Deputy DSL	Nicola Dixon (EYFS/CP)	Nicola.dixon@golden-thread.org
Deputy DSL	Layla Collins	Layla.collins@golden-thread.org
Deputy DSL	Gemma Rutherford	gemma.rutherford@golden-thread.org
Link Safeguarding Governor	Adam Legah	adam.legah@golden-thread.org

The Riverview Academy

ROLE	NAME	CONTACT DETAILS
Head of School / Deputy DSL	Jack Keen	jack.keen@golden-thread.org
Inclusion Lead / Lead DSL	Felicity Walsh	felicity.walsh@golden-thread.org
Deputy DSL	Michelle Baillie	michelle.baillie@golden-thread.org
Deputy DSL	Aimee Gallyot	aimee.gallyot@golden-thread.org
Deputy DSL	Emily Huxley	emily.huxley@golden-thread.org
Deputy DSL	Kate Williams	kate.williams@golden-thread.org
Deputy DSL	Gina Page	Gina.page@golden-thread.org
Link Safeguarding Governor	Hits Patel	hits.patel@golden-thread.org

Temple Hill Primary Academy

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Headteacher / Deputy DSL	Leon Dawson	Leon.dawson@golden-thread.org
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Deputy DSL	Melissa Scott	Melissa.scott@golden-thread.org
Deputy DSL	Claire Miller	Claire.miller@golden-thread.org
Deputy DSL	Jaya Dillon	Jaya.dillon@golden-thread.org
Deputy DSL	Emma Howe	Emma.howe@golden-thread.org
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Deputy DSL	Julie Rye	julie.rye@golden-thread.org
Deputy DSL	Rebecca Crouch	rebecca.crouch@golden-thread.org
Link Safeguarding Governor	Daniel Range	daniel.range@golden-thread.org

West Hill Primary Academy

ROLE	NAME	CONTACT DETAILS
Headteacher/Lead DSL	Katy Ward	Katy.ward@golden-thread.org
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Deputy DSL	Danielle Davenport	Danielle.davenport@golden-thread.org
Deputy DSL	Rachel Roe	Rachel.roe@golden-thread.org
Deputy DSL	Jacqui Scarboro	Jacqui.scarboro@golden-thread.org
Link Safeguarding Governor	Helena Oakes	helena.oakes@golden-thread.org

Wrotham Road Primary School

ROLE	NAME	CONTACT DETAILS
Headteacher/Lead DSL	Nicole Galinis	nicole.galinis@golden-thread.org
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Deputy DSL	Kate Fielder	kate.fielder@golden-thread.org
Deputy DSL	Rachel Evans	rachel.evans@golden-thread.org
Deputy DSL	Ratinder Bhathal	ratinder.bhathal@golden-thread.org
Deputy DSL	Emma-Jane Gent	emma-jane.gent@golden-thread.org
Deputy DSL	Jonathan Smith	jonathan.smith@golden-thread.org
Deputy DSL	Nicole McIntosh	nicole.McIntosh@golden-thread.org
Deputy DSL	Safiyah Miah	Safiyah.Miah@golden-thread.org
Link Safeguarding Governor	Mark Whitehouse	mark.whitehouse@golden-thread.org

Local Support

LADO Education Safeguarding Advisory Service (LESAS)	If your concern relates to the welfare of a child	Please contact the Front Door Service via the Kent Integrated Children's Services Portal https://kccchildrens.kent.gov.uk/web/portal/pages/home
	Front Door Service No Name Consultation, if it is unclear whether to refer	03000 411 111
	If you need to make a referral to the LADO regarding an allegation against a colleague	Please complete a LADO referral via the Kent Integrated Children's Services Portal https://kccchildrens.kent.gov.uk/web/portal/pages/home
	If you need clarification on whether to make a LADO referral, need general education safeguarding or online safety advice, or would like to enquire about training or other safeguarding products	Please use the LESAS enquiry form LADO Education Safeguarding Advisory Service (LESAS) Enquiry Form
Integrated Children's Services Out of Hours	Where urgent safeguarding action is required and your request is submitted outside of normal working hours (from 5pm – 8.30am weekdays, weekends, bank holidays) please contact the Out of Hours Service	03000 419191
Early Help	Early Help and Preventative Services - KELS!	Early Help contacts - KELS!
Kent Police	999 if there is an immediate risk of harm	101 for non-urgent
Kent Safeguarding Children Multi-Agency Partnership (KSCMP)	www.kscmp.org.uk	kscmp@kent.gov.uk 03000 421126
Adult Safeguarding	Adult Social Care 03000 41 61 61 (text relay 18001 03000 41 61 61)	social.services@kent.gov.uk
Refer Kent	https://kentcountycouncil.refernet.co.uk/	

1. Aims

The Golden Thread Alliance aims to ensure that:

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

The Golden Thread Alliance recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (colleagues, volunteers, governors, leaders, parents, carers, families, and pupils) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

The Golden Thread Alliance believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.

Colleagues working with children at The Golden Thread Alliance will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, colleagues will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

The Golden Thread Alliance recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our schools children are respected and are encouraged to talk openly, and will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

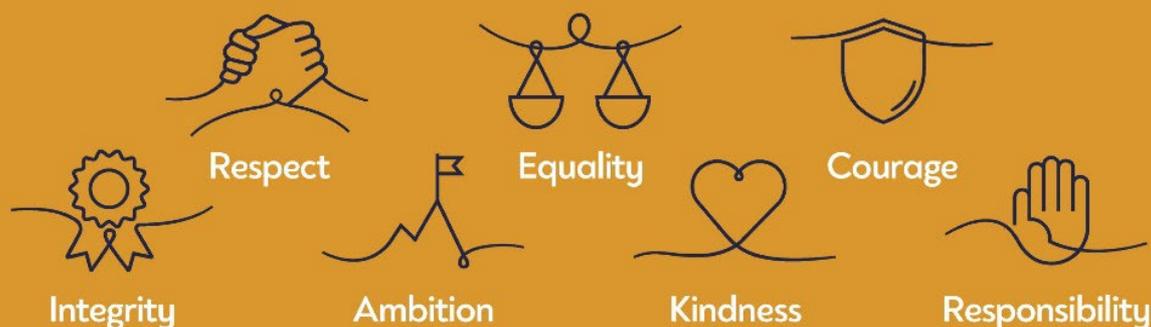
Our core safeguarding principles are:

- › Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
- › Protection: following the agreed procedures, ensuring all colleagues are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- › Support: for all pupils, parents, carers and colleagues, and where appropriate specific interventions are required for those who may be at risk of harm.
- › Collaborating with parents, carers and other agencies: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

The procedures contained in this policy apply to all colleagues, including governors, temporary or third-party agency colleagues and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' (KCSIE) 2025.

Our Values

We value diversity in our schools and our communities. What brings us together is our shared commitment to our Golden Thread Values.



2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Academy trust governance guide - Guidance - GOV.UK \(www.gov.uk\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- › Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

This policy complies with our Funding Agreement and Articles of Association.

The Golden Thread Alliance will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures www.kscmp.org.uk

3. Definitions

Safeguarding and promoting the welfare of children means:

- › Providing help and support to meet the needs of children as soon as problems emerge
- › Protecting children from maltreatment, whether that is within or outside the home, including online
- › Preventing impairment of children's mental and physical health or development
- › Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- › Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images which are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The local authority (LA)
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

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

We give special consideration to children who:

- › Have special educational needs and/or disabilities (SEND) or health conditions (see section 11)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, sexuality or are gender-questioning children

- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after (see section 13)
- › Are missing from education for prolonged periods and/or repeat occasions
- › Whose parent or carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all colleagues, volunteers, local governors and trustees across our trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The trust and schools play a crucial role in preventative education. This is in the context of a whole-trust approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by the school's:

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

5.1 All colleagues

All colleagues are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE 2025).

(London Grid for Learning provides translations of part 1 in numerous languages which can be found here; <https://lgfl.net/safeguarding/kcsietranslate>)

In addition, all colleagues who work directly with children are also expected to read annex B.

School Leaders and DSLs are expected to read and understand KCSIE in its entirety.

All colleagues will:

- › Read and understand directed parts of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- › Make a declaration at the beginning of each academic year to say that they have reviewed the guidance
- › Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they’ll be interacting with online)
- › Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All colleagues will be aware of:

- › Our systems which support safeguarding, including this child protection and safeguarding policy, the colleague code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the trust behaviour policy and school behaviour statement, and the safeguarding response to children who go missing from education
- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- › The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- › What to look for to identify children who need help or protection

Section 14 and appendix 4 of this policy outline in more detail how colleagues are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL in each school is a member of the Senior Leadership Team. The DSL names and contact details are listed at the beginning of this document. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for colleagues to discuss any safeguarding concerns. They will also ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.

When the DSL is absent, the deputy/deputies will act as cover.

If the DSL and deputy/deputies are not available, the Trust Safeguarding Team will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- › Provide advice and support to other colleagues on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other colleagues to do so
- › Contribute to the assessment of children
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support colleagues who make such referrals directly
- › Have a good understanding of harmful sexual behaviour
- › Have a good understanding of the filtering and monitoring systems (Netsweeper) and processes in place.

The DSL will also:

- › Keep the Headteacher informed of any issues (if the DSL is not the Headteacher)
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputy/deputies are set out in their job description.

5.3 The Board of Trustees

The Board will:

- › Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a Trustee and Link Governor at each school to monitor the effectiveness of this policy in conjunction with the Board of Trustees and Local Governing Committees. These are always a different persons from the DSL.
- › Ensure all colleagues undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- › Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and colleagues are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT colleagues and service providers what needs to be done to support the school in meeting these standards
- › Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems (Netsweeper) and processes in place

- The trust has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about colleagues (including supply colleagues, volunteers and contractors). The Trust Managing Allegations Policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Chair of the Board of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate.

The Trustee with responsibility for Safeguarding, Link Safeguarding Governors and Chairs will read Keeping Children Safe in Education in its entirety. Members, Trustees and Governors who are not appointed to these roles will read Parts 1 and 2 of the guidance only.

Section 15 has information on how Trustees and Governors are supported to fulfil their role.

5.4 Local Governing Committees

Governors on Local Governing Committees will review the school-specific elements of the policy after the trust level policy has been reviewed and approved.

They will also hold the Headteacher to account for the implementation of the policy.

We will appoint a member of each Local Governing Committee to act as the Governor responsible for safeguarding, to liaise with the school DSL on local safeguarding issues and report to the safeguarding trustee.

The chair of the Local Governing Committee will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see Managing Allegations Policy).

5.5 The Headteacher

The Headteacher/head of each school is responsible for the implementation of this policy, including:

- Ensuring that colleagues (including temporary colleagues) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction

- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- › Communicating this policy to parents and carers when their child joins the school and via the school website
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › Acting as the 'case manager' in the event of an allegation of abuse made against another colleague or volunteer, where appropriate (see Managing Allegations Policy)
- › Making decisions regarding all low-level concerns (including those involving supply colleagues and third parties), though they may wish to collaborate with the DSL on this
- › Ensuring the relevant staffing ratios are met, where applicable
- › Making sure each child in the Early Years Foundation Stage is assigned a key person
- › Overseeing the safe use of technology, mobile phones and cameras in the setting

5.6 Virtual School Heads

Virtual School Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

Each school has have appointed a designated teacher as follows, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children, including those in kinship care, in line with [statutory guidance](#) who will liaise with the Virtual school heads (please see section 13).

6. Confidentiality

The Golden Thread Alliance recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.

The Golden Thread Alliance has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that each school is compliant with all matters relating to confidentiality and information sharing requirements. The Trust DPO is Claire Misy (claire.misy@golden-thread.org).

The Golden Thread Alliance and all schools shall regard the following;

- › Timely information sharing is essential to effective safeguarding
- › 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

- › The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- › If colleagues need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- › Colleagues should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- › If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, colleagues may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents and carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- › Regarding anonymity, all colleagues will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which colleagues should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- › The Government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support colleagues who have to make decisions about sharing information
- › If colleagues are in any doubt about sharing information, they should speak to the DSL (or deputy)

7. Recognising Abuse and Taking Action

All colleagues are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- › Is disabled
- › Has special educational needs (whether or not they have a statutory education health and care plan)
- › Is a young carer
- › Is bereaved
- › Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- › Is frequently missing/goes missing from education, care or home
- › Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- › Is at risk of being radicalised or exploited
- › Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- › Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- › Is misusing drugs or alcohol
- › Is suffering from mental ill health
- › Has returned home to their family from care
- › Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- › Is a privately fostered child
- › Has a parent or carer in custody or is affected by parental offending
- › Is missing education, or persistently absent from school, or not in receipt of full-time education
- › Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Colleagues, volunteers, trustees governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”. Should The DSL or Deputies not be available, colleagues may contact the Trust Safeguarding Lead for advice in their absence or see below for pupils in immediate danger.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

If colleagues have concerns about a child's welfare, they are expected to act on them immediately. The DSL or a deputy should always be available to discuss safeguarding concerns. If, in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by colleagues. In this event, colleagues should take advice from [Kent Children's Social Care](#) or report using the [Kent Integrated Children's Services Portal](#), otherwise known as the "Front Door", with any action taken shared with the DSL at the earliest opportunity.

In the absence of a DSL, deputy or senior leaders, colleagues should make a referral to Kent Children's Social Care and/or the police **immediately** if they believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Referrals link for professionals; <https://kccchildrens.kent.gov.uk>

Referrals link for the public; <https://www.kent.gov.uk/social-care-and-health/report-abuse> 03000 411111 social.services@kent.gov.uk text relay 018001 03000 411111, out of hours 03000 419191.

Referrals for children residing in other local authorities; <https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- › Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- › Only prompt the child where necessary with open questions to clarify information. For example, who, what, where, when; or Tell, Explain, Describe (TED)
- › Stay calm and do not show that you are shocked or upset
- › Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- › Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- › Write up your conversation as soon as possible in the child's own words and language. Stick to the facts, and do not put your own judgement on it
- › Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- › Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- › Not recognise their experiences as harmful
- › Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other colleague who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Colleagues should not examine pupils.

Any colleague who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures which can be found here <https://www.proceduresonline.com/kentandmedway/chapters/contents.html>

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early assessment help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Colleagues may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: <https://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services>

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The Kent Escalation and Professional Challenge policy sets out the escalation pathway to be followed in the event of professional disagreements which cannot be resolved between individual practitioners and can be found here <https://www.kscmp.org.uk/procedures> .

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of being becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school colleagues and local governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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.

Colleagues will be alert to behavioral signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

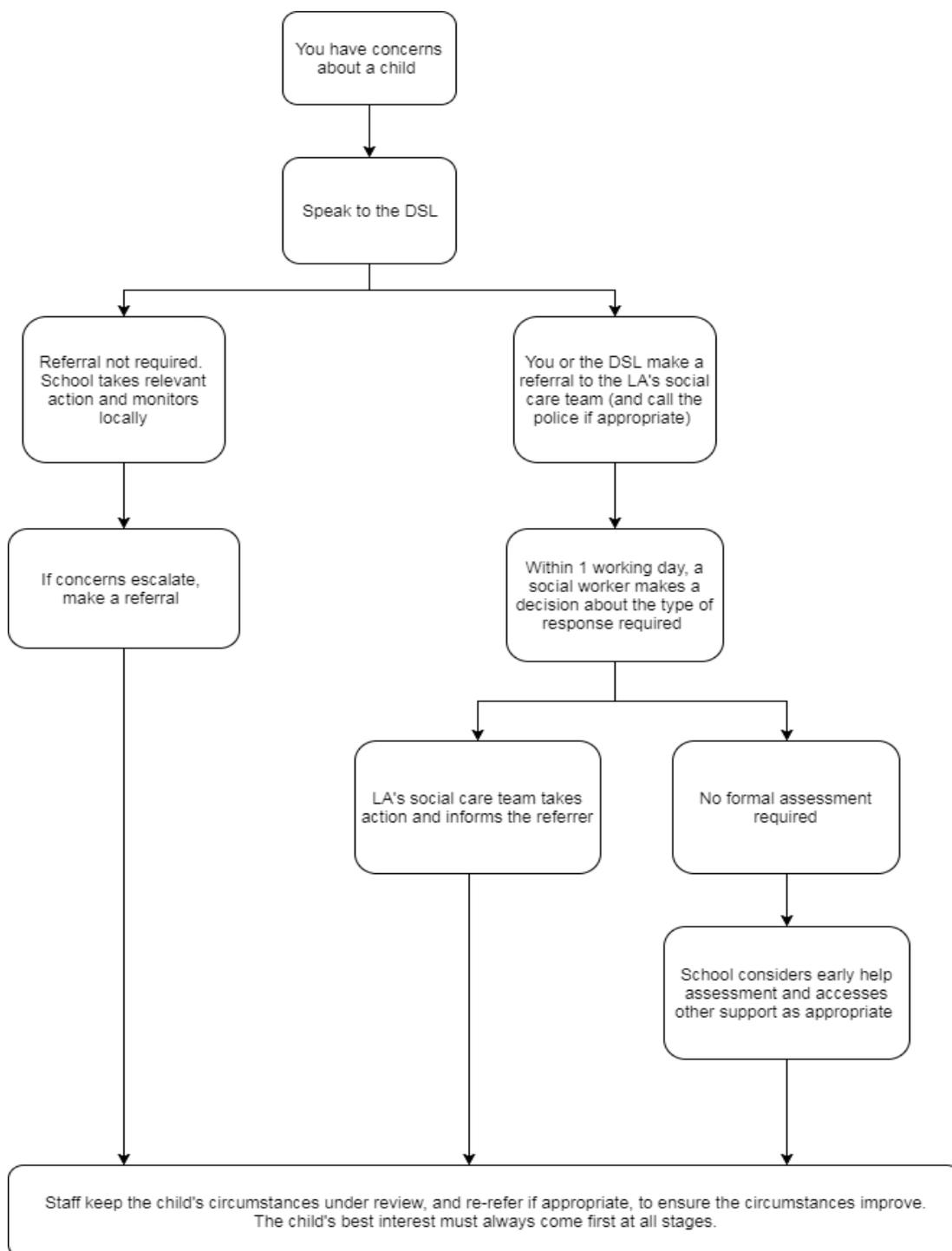
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

DSLs and school colleagues should refer to the DfE guidance on [mental health and behaviour in schools](#) for more information.

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a colleague, supply teacher, volunteer or contractor

Any concerns or allegations about colleagues will be recorded and dealt with appropriately in line with part four of Keeping Children Safe in Education and the [Local Kent Arrangements](#), including discussions as necessary with the Local Authority Designated Officer (LADO).

More detailed information can be found in the Managing Allegations and Low-Level Concerns Policy within the People Manual.

Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Where headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [LADO Education Safeguarding Advisory Service enquiry form](#).

After resolving or concluding allegations or low-level concerns about colleagues, the headteacher/principal, along with the LADO, if involved, will review the case to identify lessons learned and any possible improvements.

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

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 2 for more information about child-on-child abuse.

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

If a pupil makes an allegation of abuse against another pupil:

- › You must record the allegation and tell the DSL, but do not investigate it
- › The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2025 (in particular, part two and five). Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:

- Taking reports seriously and colleagues listening carefully
- Avoiding victim blaming
- Providing appropriate pastoral support
- Working with parents and carers
- Reviewing educational approaches
- Following procedures as identified in other policies e.g. behaviour policy
- Where necessary and appropriate, informing the police and/or ICS

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

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

To achieve this, we will:

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

- › Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- › Ensure colleagues reassure victims that they are being taken seriously
- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- › Ensure colleagues are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – colleagues should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - Colleagues may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s), where needed. We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

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

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

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- › Delete the imagery or ask the pupil to delete it
- › Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- › Share information about the incident with other colleagues, the pupil(s) it involves or their, or other, parents and carers
- › Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school colleagues – this may include the colleague who reported the incident and the safeguarding or

leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- › What further information is required to decide on the best response
- › Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to delete or remove images or videos from devices or online services
- › Any relevant facts about the pupils involved which would influence risk assessment
- › If there is a need to contact another school, college, setting or individual
- › Whether to contact parents and carers of the pupils involved (in most cases parents and carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- › The incident involves an adult
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and colleagues as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents and carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through contacting the non-emergency number (101).

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

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

- › What it is
- › How it is most likely to be encountered
- › The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- › Issues of legality
- › The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- › Specific requests or pressure to provide (or forward) such images
- › The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- › Putting safeguarding first
- › Approaching from the perspective of the child
- › Promoting dialogue and understanding
- › Empowering and enabling children and young people
- › Never frightening or scare-mongering
- › Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- › Put systems in place for pupils to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- › Share our child friendly safeguarding policy with the children at least twice a year, so they know how to report and to whom
- › Ensure our PSHE and RSE curriculums regularly address reporting
- › Provide opportunities to talk to colleagues discreetly through use of 'chatter' or 'worry' boxes
- › Offer children a choice of adult to talk to should they appear distressed or wish to report
- › Where appropriate, appoint class councilors each term who play a role in supporting their peers in reporting their concerns
- › Ensure all colleagues receive training on how to deal with and support pupils who express concerns and ensure that they feel safe in doing so as part of the annual safeguarding CPD,
- › Colleagues are trained to support pupils when they make a disclosure to understand they will not be in trouble and will be kept safe.
- › Encourage children to know who their trusted adults are
- › Resources such as NSPCC PANTS are used to teach children that they should tell a safe adult they trust, if anything makes them feel upset or worried.

8. Safer Recruitment

8.1 Safer Recruitment and Safeguarding Checks

The Golden Thread Alliance is committed to ensure that we develop a safe culture and that all steps are taken to recruit colleagues and volunteers who are safe to work with our pupils and colleagues.

- › The Golden Thread Alliance will follow relevant guidance in Keeping Children Safe in Education 2025 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
- › The Governing Body and leadership team are responsible for ensuring that the schools follow safe recruitment processes as outlined within guidance.
- › The Governing Body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- › The schools maintain an accurate Single Central Record (SCR) in line with statutory guidance.

- › The Golden Thread Alliance are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- › We advise all colleagues to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- › Where a school places a pupil with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
- › The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- › Where a school organises work experience placements, they will follow the advice and guidance as identified in Part three of KCSIE 2025.

For further information regarding Safer Recruitment, please refer the Safer Recruitment Policy.

9. Online Safety and the Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, The Golden Thread Alliance aims to:

- › Have robust processes in place (including filtering and monitoring) to ensure the online safety of pupils, colleagues, volunteers and governors
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- › **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- › **Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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

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

- › Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- › Train colleagues, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalization, and their expectations, roles and responsibilities around filtering and monitoring. All colleagues will receive refresher training as required and at least once each academic year
- › Educate parents and carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure colleagues are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Colleagues are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Colleagues will not take pictures or recordings of pupils on their personal phones or cameras
- › Make all pupils, parents, carers, colleagues, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all colleagues, pupils, parents and carers are aware that colleagues have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- › Provide regular safeguarding and children protection updates including online safety to all colleagues, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

- › Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Procedures

- › The DSL has overall responsibility for online safety within the school but will liaise with other colleagues, for example IT technicians and curriculum leads as necessary.
- › The DSL will respond to online safety concerns in line with our child protection and other associated policies, including the school's individual Anti-bullying policy and behaviour policies.
- › Internal sanctions and/or support will be implemented as appropriate.
- › Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- › The Golden Thread Alliance uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
- › All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

The Golden Thread Alliance recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2025 and EYFS 2025 The Golden Thread Alliance has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. For further information regarding Online Safety, please refer to the Online Safety Policy.

10. Notifying Parents and Carers

Where appropriate, we will discuss any concerns about a child with the child's parents and carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other colleagues will only talk to parents and carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents and carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents and carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- › Meet with the victim's parents and carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- › Meet with the alleged perpetrator's parents and carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

11. Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges
- › Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

To address these additional challenges, our schools will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.

Our schools have robust intimate/personal care policies which ensure that the health, safety, independence and welfare of children is promoted, and their dignity and privacy is respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO).

12. Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all colleagues will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- › Responding to unauthorised absence or missing education where there are known safeguarding risks
- › The provision of pastoral and/or academic support

13. Looked-After and Previously Looked-After Children

We will ensure that colleagues have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- › Appropriate colleagues have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- › The DSL has details of children's social workers and relevant virtual school Heads

Each school has have appointed a designated teacher as follows, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

SCHOOL	NAME	CONTACT DETAILS
Culverstone Green Primary School	Charlotte Casey	charlotte.casey@golden-thread.org
Fleetdown Primary Academy	Nicola King	Nicola.king@golden-thread.org
Meopham Community Academy	Daniel Taylor	daniel.taylor@golden-thread.org
Oakfield Primary Academy	Jill Gosbee	Jill.gosbee@golden-thread.org
The Riverview Academy	Felicity Walsh	Felicity.walsh@golden-thread.org
Temple Hill Primary Academy	James Davies	James.davies@golden-thread.org
West Hill Primary Academy	Katy Ward	Katy.ward@golden-thread.org
Wrotham Road Primary School	Emma-Jame Gent	Emma-jane.gent@golden-thread.org

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the Designated Teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school Heads to promote the educational achievement of looked-after and previously looked-after children, including those in kinship care, which may also include discussing how pupil premium plus funding can be best used to support these children and meet the needs identified in their personal education plans.

14. Complaints and Concerns About School Safeguarding Policies

All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. Each school has a complaints policy available to parents, carers, pupils, colleagues and visitors who wish to report concerns or complaints. This can be found on individual school websites or can be obtained from the school on request.

14.1 Complaints against colleagues

Complaints against colleagues that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against colleagues (see People Manual).

14.2 Other complaints

Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk.

Colleagues can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

Colleagues can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

The leadership team at The Golden Thread Alliance will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

15. Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

15.1 Local record keeping arrangements

All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system, CPOMS and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

Records will be completed as soon as possible after the incident/event, using the child's words and will be dated by the colleague. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.

If there is an immediate safeguarding concern the colleague will consult with a DSL before completing the form as reporting urgent concerns takes priority.

If colleagues are in any doubt about recording requirements, they will discuss their concerns with the DSL.

Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

Colleagues will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2025), the Information Commissioner's Office (ICO) and the DfE 'Information Sharing Advice for Safeguarding Practitioners' (2018) guidance provides further details regarding information sharing principles and expectations.

16. Training

16.1 All colleagues

All colleagues will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- › Be integrated, aligned and considered as part of the whole-trust safeguarding approach and wider colleagues training, and curriculum planning
- › Be in line with advice from the three safeguarding partners
- › Include online safety, including an understanding of the expectations, roles and responsibilities for colleagues around filtering and monitoring
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All colleagues will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being becoming involved with or supporting terrorism and to challenge extremist ideas.

Colleagues will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and briefings).

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and [Deputy/Deputies]

The DSL and [deputy/deputies] will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

16.3 Trustees [and local governors]

All trustees [and local governors] receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against CEO, they receive training in managing allegations for this purpose.

17. Missing Child Arrangements

Colleagues are expected to be vigilant at all times to ensure the safety and welfare of children. Should a child go missing from a class or other activity, the Headteacher should be notified immediately. The school grounds should then be searched, and contact made home in the event that the child is not found. If the child is not at home, the school should contact the police immediately and then notify the Director of Education.

In the absence of the Director of Education; the CEO, The Trust Safeguarding Lead, or the executive PA to the CEO should be notified.

When a missing child has been located and safely returned to school or home, the Director of Education or CEO may commission an investigation into the circumstances of the child missing in order to identify any factors that need to be addressed by the school or communicated to parents and carers to prevent any reoccurrence.

18. Monitoring Arrangements

This policy will be reviewed annually by The Trust Safeguarding Lead, in conjunction with Headteachers and DSLs. At every review, it will be approved by the Board of Trustees.

19. Links with Other Policies

This policy links to the following policies and procedures:

- › Behaviour
- › People Manual
- › Complaints
- › Health and safety
- › Attendance

- › Online Safety
- › Mobile phone use
- › Equality
- › Relationships and sex education
- › First aid
- › Curriculum
- › Designated teacher for looked-after and previously looked-after children
- › Privacy notices
- › Whistleblowing
- › ICT Acceptable Use

Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- › Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- › 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
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- › Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- › Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males, a person of any gender can also commit acts of sexual abuse, as can other children.

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 and shelter (including exclusion from home or abandonment)
- › Protect a child from physical and emotional harm or danger
- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

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

Appendix 2: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from children and young people using online platforms.

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

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

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

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

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them. Throughout 2022 and 2023, there has been a considerable increase in reporting of these incidents.

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

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

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

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

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

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

Children Missing from Education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a school
- › Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Colleagues will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a colleague suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by a person of any gender, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation
- › Suffering from changes in emotional wellbeing
- › Misusing drugs and alcohol
- › Going missing for periods of time or regularly coming home late
- › Regularly missing school or education
- › Not taking part in education

If a colleague suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by a person of any gender, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- › Having an older boyfriend or girlfriend
- › Suffering from sexually transmitted infections or becoming pregnant

If a colleague suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
- › 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 nude and semi-nude 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
- › 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If colleagues have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

All schools within the Golden Thread Alliance are Operation Encompass Schools. This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.

- Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enable us to put immediate support in place according to the child's needs.
- Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child's welfare.

Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

Further information regarding Operation Encompass can be found on the [Operation Encompass website](#).

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy/deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed 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 this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All colleagues will be alert to the possibility of a child being at risk of HBA or already having suffered it. If colleagues have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that colleagues have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a colleague discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

Potential signs that a pupil may be at risk of FGM include:

- › The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- › FGM being known to be practised in the girl's community or country of origin

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

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

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

Since February 2023, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial ‘marriages’, as well as legal marriages. Colleagues will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a colleague suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- › Speak to the pupil about the concerns in a secure and private place
- › Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- › Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk

- › Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing Radicalisation

- › **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- › **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- ›
- › **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that colleagues have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Colleagues will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance

- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or Twitter
- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – colleagues should have confidence in their instincts and seek advice if something feels wrong.

If colleagues are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Colleagues should **always** take action if they are worried.

Sexual Violence and Sexual Harassment Between Children in Schools

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that colleagues make sure they 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, colleagues will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing additional training to colleagues could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or gender questioning children are at greater risk.

Colleagues should be aware of the importance of:

- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If colleagues have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious Violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- › Being male
- › Having been frequently absent or permanently excluded from school

- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Colleagues will be aware of these indicators and risk factors. If colleague has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity to the satisfaction of colleagues during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate) All other visitors, including visiting speakers, will be accompanied by a colleague at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or colleagues.

Appendix 3: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

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

Support for Colleagues

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

Support for Learners

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

Support for Adults

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

- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

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

Contextual Safeguarding Network

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

Kent Resilience Hub

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

Substance Misuse

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

Domestic Abuse

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

Criminal and Sexual Exploitation

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

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/783684/FGM_The_Facts_A6_v4_web.pdf
- Mandatory reporting of female genital mutilation: procedural information: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

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

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/online-safety and www.net-aware.org.uk

- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/cyber-choices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

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

Radicalisation and hate

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

Children with Family Members in Prison

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