



**ROSE HILL SCHOOL**  
ROYAL TUNBRIDGE WELLS

**Safeguarding & Child Protection Policy**

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## Rose Hill School: Safeguarding & Child Protection

*Nisi Dominus Frustra* - Without the Lord, everything is in vain

### MISSION STATEMENT

- \* A Rose Hill School child's learning experience is one of aspiration, adventure, and achievement in a nurturing, caring school.

### AIMS

Working with **integrity** your child will:

- \* Be inspired to develop **confidence** to thrive in all areas of our rich curriculum.
- \* Foster the skills and talents which enable them to **organise** their learning and plan to achieve success.
- \* Demonstrate **persistence** to flourish in the face of challenge.
- \* Show **resilience** and learn from difficult situations.
- \* **Get along** with others, work collaboratively and accept everyone.

### Safeguarding Statement - 'It could happen here': 'see something, say something'

Rose Hill School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be listened to effectively.

The purpose of this policy is to provide staff, volunteers and Governors with the framework they need in order to keep children safe (including those in the EYFS setting) and secure in our school. This policy, along with Keeping Children Safe in Education, is information and applies to all staff. All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

### Terminology

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

**Safeguarding** and promoting the welfare of children is defined by Working Together, 2023, as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework;

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Early Help** means the providing support as soon as additional needs and support emerge at any point in a child's life. All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- 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 alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

**Staff** refers to all those working for or on behalf of the School, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child(ren)** for our purposes includes **all** pupils in the school, including those who are over 18. On the whole, this will apply to pupils of our school; however the policy will extend to visiting children and pupils from other establishments.

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a **Looked After Child** then this will be the Children's Services in their home authority.

**KSCMP** refers to the Kent Safeguarding Children Multi-agency Partnership (information found [here](#))

### **Linked Policies**

This policy has been developed in accordance with the principles established by government publications and guidance and those of the Kent Safeguarding Children, including:

[Kent Safeguarding Children protocols, guidance and procedures](#)

[Working Together to Safeguard Children \(2023\)](#)

[Keeping Children Safe in Education 2025 \(KCSIE\)](#)

[Disqualification under the Childcare Act 2006 \(2018\)](#)

[FGM Act 2003 Mandatory Reporting Guidance 2016](#)

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

[Teacher Standards 2011](#)

[Information Sharing Advice for Practitioners' guidance 2018](#)

[Children Missing Education](#)

[The Prevent duty: safeguarding learners vulnerable to radicalisation: Support for those](#)

[working in education settings with safeguarding responsibilities 2023](#)  
[Restrictive Physical Intervention](#)  
[Early Years Foundation Stage Statutory Framework 2024](#)  
[KSCMP Early Help Levels of Need \(thresholds and guidance\)](#)  
[Independent School Standards Regulations 2014](#)  
[Data Protection Act 2018 Overview and GDPR](#)  
[Equality Act 2010](#)  
[Charities Act 2011](#)  
[Sexual Violence & Sexual Harassment between children in schools and colleges, 2021](#)  
[RSHE 2019](#)  
[Behaviour in School 2022](#)  
[School and College Security, Gov UK, 2019](#)  
[SVGA Safeguarding Vulnerable Groups Act, 2006](#)  
[Meeting digital and technology standards in schools and colleges, Gov UK, Nov 2024](#)

This policy works in conjunction with the following internal school policies, procedures and records:

Recruitment, Selection and Disclosure Policy and Procedure, Whistleblowing Policy, Single Central Record of Appointments, Rose Hill School Code of Conduct (Staff), Behaviour Policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), Anti-Bullying Policy, Esafety Policy (including cyberbullying and online safety), Acceptable Use Policy (Staff, Pupils & Guests), Restricted Physical Restraint, Missing Pupil Policy & Children Missing Education Policy

**School Contacts**

(all e-mail addresses below are @rosehillschool.co.uk)

Designated Safeguarding Lead:	Imogen Scarbrough	safeguarding@ 07305 172049
Deputy DSLs:	Emma Neville Victoria Robinson	safeguarding@

Imogen Scarbrough is the Deputy Head & DSL (Safeguarding) and sits on SLT at Rose Hill School.

Emma Neville is the Head.

Victoria Robinson is Head of PrePrep and DSL for EYFS Safeguarding

*Nominated Child Protection Governor is **Gwen Taylor-Hall***

*Contact through the Clerk to the Governors: [clerktothegovernors@rosehillschool.co.uk](mailto:clerktothegovernors@rosehillschool.co.uk)*

*Chairman of Governors for the School is **Nick Powell***

*Contact through the Clerk to the Governors: [clerktothegovernors@rosehillschool.co.uk](mailto:clerktothegovernors@rosehillschool.co.uk)*

### External Agency Contacts

The School's local safeguarding is **Kent Safeguarding Children – multi agency partnership**. The website can be found [here](#). Or email: [central.duty@kent.gov.uk](mailto:central.duty@kent.gov.uk).

Kent Safeguarding Children Multi-Agency Partnership	
Room 2.71, Sessions House, County Road, Maidstone, ME14 1XQ Email: <a href="mailto:kscmp@kent.gov.uk">kscmp@kent.gov.uk</a> and <a href="http://www.kscmp.org.uk">www.kscmp.org.uk</a>	
Kent Front Door	
Kroner House, Eurogate Business Park, Ashford, TN24 8XU, <b>Tel:</b> 03000 41 11 11 <b>Email:</b> <a href="mailto:frontdoor@kent.gov.uk">frontdoor@kent.gov.uk</a> Out of Hours: <b>Tel:</b> 03000 41 91 91	
Education Safeguarding Service Contacts	
<b>Head of Service</b>	<b>Tel:</b> 03301 651 200
<b>Training and Development Manager</b>	<b>Tel:</b> 03301 651 110
<b>Online Safety</b>	<b>Tel:</b> 03301 651 500 <b>Email:</b> <a href="mailto:Onlinesafety@theeducationpeople.org">Onlinesafety@theeducationpeople.org</a>
<b>Senior Safeguarding Advisor</b>	<b>Tel:</b> 03301 651 200
<b>For advice on safeguarding issues, please call your area office on the number listed below:</b>	
<b>Tunbridge Wells</b>	03301 651 440
<b>E-mail all general queries to:</b>	<a href="mailto:edsafeguardinghq@theeducationpeople.org">edsafeguardinghq@theeducationpeople.org</a>
Additional Contacts	
<b>NHS Kent and Medway</b>	<b>Email:</b> <a href="mailto:Kmicb.kentandmedway@nhs.net">Kmicb.kentandmedway@nhs.net</a> <b>Tel:</b> 01634 335095
<b>Kent and Medway Police</b>	<b>Tel:</b> 101 and ask to speak to someone in the Child Abuse Investigation Unit
<b>LADO</b>	<b>Tel:</b> 03000 41 11 11 <b>Email:</b> <a href="mailto:kentchildrenslado@kent.gov.uk">kentchildrenslado@kent.gov.uk</a> <a href="https://kccchildrens.kent.gov.uk/web/portal/pages/home">https://kccchildrens.kent.gov.uk/web/portal/pages/home</a>

Further information can be found: <http://www.kelsi.org.uk/child-protection-and-safeguarding>

### LADO Education Safeguarding Advisory Service (LESAS) Mission Statement

The County LADO service and Education Safeguarding Service merged in September 2024 following an evaluation of the two services. This decision aligns both services with the national 'Working Together to Safeguarding Children' agenda and will result in increased capacity to provide LADO and education safeguarding support to Kent education settings and the wider Children's workforce.



#### What we do

Our role is to continue and build upon the statutory LADO function for the whole of the children's workforce and support education settings (early years settings, childminders, schools, and colleges) in Kent who work with children aged 0-18 to meet their safeguarding responsibilities and respond to safeguarding concerns.

Our team is made up of experienced social work and education professionals who have a thorough understanding of key local and national legislation and statutory guidance related to safeguarding and education safeguarding practice.

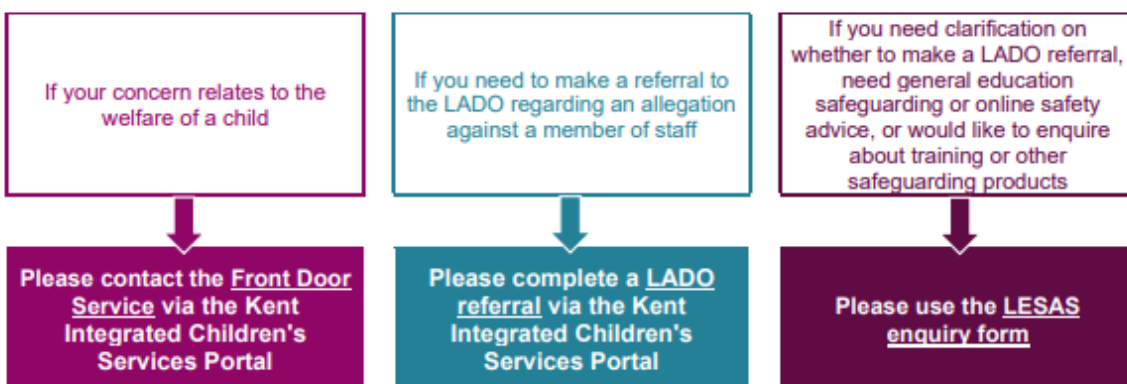
#### What we provide

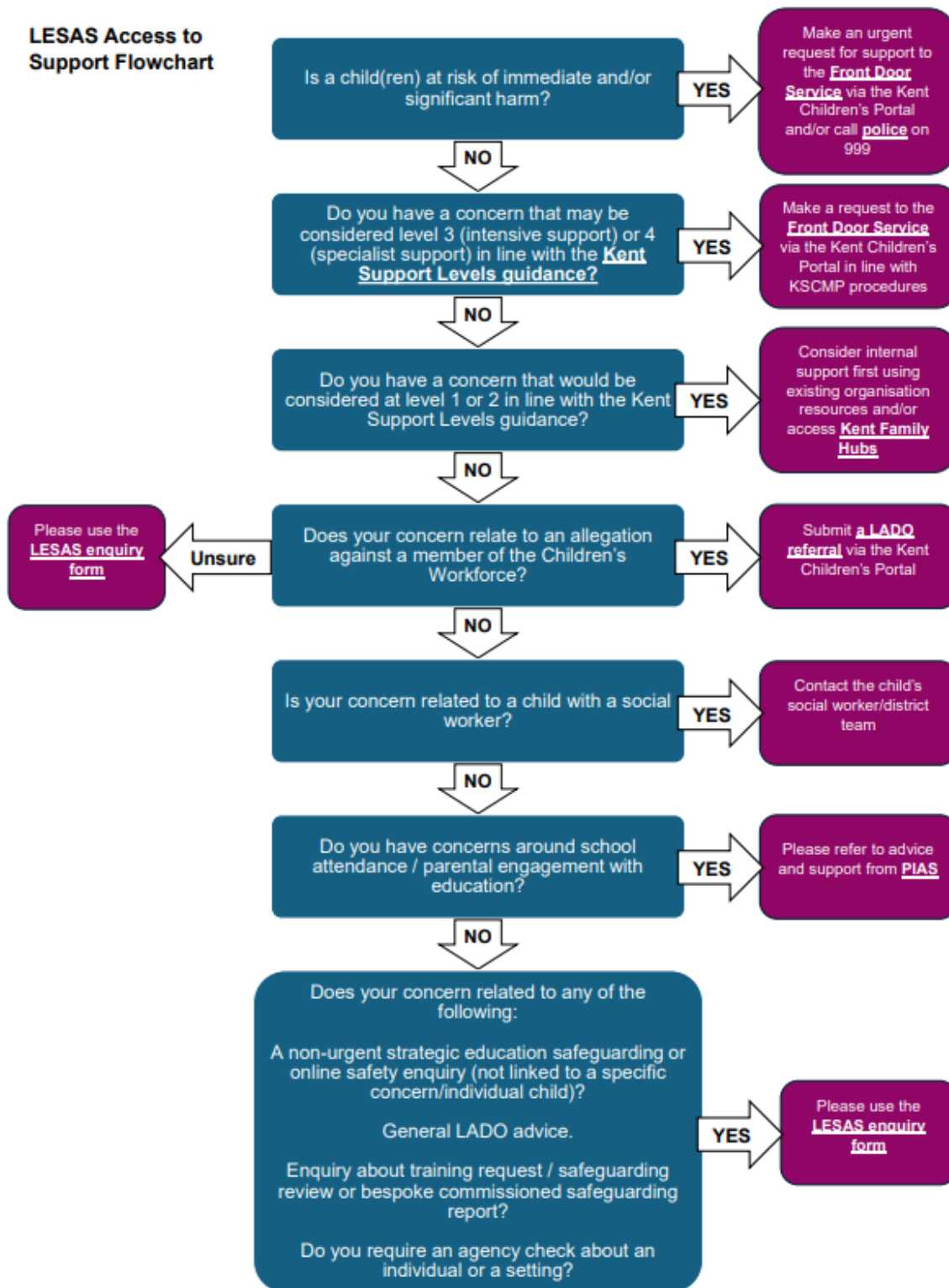
We provide a variety of different types of support to education settings in Kent, this includes:

- Undertaking the LADO statutory function; primarily this involves managing the process when an allegation is made against a member of the children's workforce, not just education specific, in Kent.
- Advice for education settings on how they can meet their safeguarding responsibilities, including online safety specific advice, via an enquiries service. This does not include queries relating to individual children; in these cases, a request for support should be submitted to the Front Door Service.
- Up-to-date exemplar Child Protection policy and Acceptable Use Policy for education providers to adapt.
- Support for education settings in times of crisis and unexpected critical incidents, for example following the unexpected death of a child who attends the setting.
- A termly newsletter for Designated Safeguarding Leads (DSL) in education settings.
- Termly Designated Safeguarding Leads (DSL) 'catch up' meetings to share local information and guidance.
- Targeted outreach work and subsidised support for education settings following critical safeguarding needs.

The service can also be commissioned to provide a range of high-quality training and other safeguarding support products for DSLs and staff within the children's workforce, including safeguarding reviews which promote best practice and empower education settings to ensure their learners are as safe as they can be.

#### Contacting us





The **Independent Schools Inspectorate** (ISI) website can be found [here](#).

The **Kent Social Services**: 03000 41 11 11. Email: [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk).

The one number above is used for all enquiries. The DSL must seek a consultation with a duty manager or social worker when not sure about making a referral. If a child's home address is outside Kent, the above number will also elicit the correct children's services contact point. Urgent child protection issue outside of working hours (5pm-8.30am) must be directed to of office hours the Central Duty Out of Hours Number: 03000 41 91 91 or, in an emergency, the

Kent police should be called on 999.

**The Local Authority Designated Officer (LADO):** 03000 41 11 11. Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk). The LADO manages allegations against individuals who work or volunteer with children in Kent. It bears repeating here that any individual is able to make a referral, not just a DSL or member of the MT. **ANYONE CAN MAKE A REFERRAL.** <https://kccchildrens.kent.gov.uk/web/portal/pages/home>.

**Kent Safeguarding Children Multi-agency Partnership (KSCMP): Email:** [central.duty@kent.gov.uk](mailto:central.duty@kent.gov.uk). KSCMP responds to enquiries about children and young people as a result of police involvement with the child or their family and other safeguarding concerns (as from 17 September 2019).

**KSCMP Kent Child Protection** procedures are available at <http://www.proceduresonline.com/kentandmedway/>

**The Early Help Preventative Service** will assist the School, supporting enquires and the Lead Professional on 03000 41 62 00 or email [TunbridgeWellsEarlyHelp@kent.gov.uk](mailto:TunbridgeWellsEarlyHelp@kent.gov.uk)

**Kirstie Owen the Education Safeguarding Adviser** for West Kent can be contacted for advice on Office: 03000 412284 or Mob: 07540 677200 or email: [kirstie.owen@kent.gov.uk](mailto:kirstie.owen@kent.gov.uk)

**Rebecca Avery the e-Safety Officer** for Kent can be contacted for advice on Office: 03000 415797 or Mob: 07920108828

**KSCMP PREVENT:** The KSCMP Prevent contact, Nick Wilkinson at [nick.wilkinson@kent.gov.uk](mailto:nick.wilkinson@kent.gov.uk), who is the county Lead for Prevent, and Head of Youth Justice and Safer Young Kent, Early Help and Preventatives Services. Or Email: [channel@kent.pnn.police.uk](mailto:channel@kent.pnn.police.uk) or for further information please email: [PreventLocalDelivery@homeoffice.x.gsi.gov.uk](mailto:PreventLocalDelivery@homeoffice.x.gsi.gov.uk).

**DfE PREVENT support:** The DfE's dedicated telephone helpline and mailbox for non-emergency advice for staff and governors is 020 7340 7264. Email: [counter-terrorism@education.gsi.gov.uk](mailto:counter-terrorism@education.gsi.gov.uk).

**CSE:** Operation Willow 'say something if you see something' is a campaign to raise awareness of child sexual exploitation. If you have concerns about a child please call Kent Police on 101 quoting Operation Willow. You can also call the **National Child Sexual Exploitation Helpline** on 11 60 00.

**FGM:** The Diversity Crimes Unit (DCU), a dedicated Kent Police team that deals with honour-based abuse (HBA), forced marriage and female genital mutilation (FGM), can be reached on 01483 639673. Email: [diversitycrimesunit@Kent.pnn.police.uk](mailto:diversitycrimesunit@Kent.pnn.police.uk). **The reporting of FGM is mandatory.**

**School Liaison Officer:** Liberty Hand will be notified where any child transfers from the School at a non-transition time. Email: Tel: 03000 412039 Email: [liberty.hand@kent.gov.uk](mailto:liberty.hand@kent.gov.uk) For procedure information click [here](#):

**Police (non-emergency):** Our The Divisional Commander is Chief Superintendent Robert Fordham (West Division policing area) our Tunbridge Wells District Commander – Chief Inspector Peter Steenhuis, Tunbridge Wells Police Station, Crescent Road, Tunbridge Wells TN1 2LU: 01622 690690. And Police liaison office Amelia Brooker.

**Operation Encompass:** Allyson Vincer PSE 60712, Op Encompass – SPOC, PVP Administrator, Central Referral Unit, Kroner House, Ashford. Email: Allyson Vincer 46060712 [Allyson.Vincer@kent.police.uk](mailto:Allyson.Vincer@kent.police.uk) Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Information is shared by the police with a school's trained Key Adult (DSL) prior to the start of the next school day after officers have

attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the child.

**OFSTED Safeguarding Children:** 08456 404046 (Monday to Friday 8.00am to 6.00pm). Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

**Disclosure and Barring Service:** 01325 953795. [The government webpage can be found here.](#)

**Teaching Regulation Agency** information and details can be found [here](#). Tel: 0207 593 5393.

**Children's Commissioner:** <http://www.childrenscommissioner.gov.uk/>

**NSPCC:** <http://www.nspcc.org.uk/>

### **Dedicated NSPCC helpline 0800 136 663**

The new helpline will provide both children and adults who are potential victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals too.

**Childline:** <http://www.childline.org.uk/>

**CEOPS Thinkuknow:** <https://www.thinkuknow.co.uk/>

**Barnardo's:** The See, Hear, Respond Partnership is a new service funded by the Department for Education. With your help, the See, Hear, Respond Partnership will quickly identify and support children, young people and families who are struggling to cope with the impacts of coronavirus: <https://www.barnardos.org.uk/see-hear-respond>: by calling **0800 008 7005** or emailing at [supporterrelations@barnardos.org.uk](mailto:supporterrelations@barnardos.org.uk). Open Monday-Friday, 9am-5pm.

## **1 - Introduction**

This policy has been developed in accordance with the principles established by the statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Education and Training (Welfare of Children) Act 2021. Schools in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

Links to statutory guidance [Working Together to Safeguard Children](#);

- departmental advice [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#); and
- departmental advice [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, DfE 2021](#)

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' (KCSIE), and Kent Safeguarding Children Procedures.

The Governing Council, Senior Leadership and Management Teams take seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and Governors in the School.

It is essential that everybody working at Rose Hill School understands their safeguarding responsibilities. The Governors ensure that those staff who work directly with children read at least Part one of Keeping Children Safe in Education. The Governor, working with the Senior

Leadership Team and especially the DSL (Imogen Scarbrough), ensure that those staff who do not work directly with children read Part one and Annex B of Keeping Children Safe in Education to safeguard and promote the welfare of children. The Governors ensure that staff training is in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education. Further training is in place for EYFS staff to support the children in their care.

## **2 - Policy Principles & Values**

The welfare of the child is paramount.

Maintain an attitude of 'it could happen here' and 'see something, say something'.

Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

All children have a right to be protected from harm and abuse. All staff have a role in the prevention of harm, abuse, neglect and exploitation and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the School or in the community, taking into account assessment of risk outside the home, in accordance with statutory guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

Whilst the School will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents, if this is believed to be in the child's best interests.

## **3 - Policy Aims**

To demonstrate the School's commitment with regard to safeguarding and child protection to pupils, parents and other partners.

To safeguard young people through early identification of their level of need: those who have suffered or are likely to suffer significant harm; those who are in need of additional support; and those alleging abuse.

To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.

To enable the School effectively to contribute to Early Help, assessments of need and support for those children.

To provide robust school systems and procedures that is followed by all members of the school community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.

To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a single central record is kept for audit.

We comply with the [Disqualification under the Childcare Act 2006](#) guidance issued in August 2018.

## **4 - Supporting Children**

We recognise that school may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

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

Our school will support all children:

- We will promote a caring, safe and positive environment within the School.
- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- We will ensure children are taught to understand and manage risk through the School's Wellbeing Programme (which includes Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE) and through all aspects of school life, reflecting the mandatory legislation. This includes online safety.
- We will respond sympathetically to any requests for time out to deal with distress and anxiety.
- We will offer details of helplines, counselling or other avenues of external support.
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.

**Mental Health: Appendix 7** provides staff, pupils and parents with additional information that will support us in protecting our pupils, in areas such as mental health, domestic abuse, child criminal and sexual exploitation and county lines.

It is important that we are alert to the fact some children will have suffered harm during lockdown. As well as exposure to domestic abuse, online harms and radicalisation, children could have broader welfare and/or mental health concerns. All staff should be aware that mental health issues may be an outcome or indicator of trauma or abuse. Part 1 of KCSIE provides all staff with a basic understanding of what to look out for and what to do if they have a concern. This information is shared with staff to support our pupils.

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

impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education. We can access a range of advice to help us identify children in need of extra mental health support, this includes working with external agencies.

More information can be found in the [Mental Health and Behaviour in Schools guidance](#). Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans for our Year 7 & 8 pupils.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following our Safeguarding & Child Protection Policy, and speaking to the DSL or a deputy. We will notify Social Care immediately if there is a significant concern.

We will provide continuing support to a child about whom there have been concerns who leaves the School by ensuring that information is shared under confidential cover to the child's new setting and ensure the School medical records are forwarded as a matter of priority and within statutory timescales.

### **5 - Prevention / Protection**

We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The School will:

Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.

Include regular consultation with children, such as through questionnaires, participation in anti-bullying activity, asking children to report whether they have had happy/sad lunchtimes/playtimes.

Ensure that all children know there is and can access an adult in the School whom they can approach if they are worried or in difficulty.

Include safeguarding across the curriculum, including Wellbeing (which itself includes PSHEE), opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online safety, accessing emergency services, road safety, pedestrian and cycle training, as well as focused work in Year 6 to prepare for transition to secondary schooling and more personal safety/independent travel.

Ensure all staff are aware of School guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

### **6 - Safe School, Safe Staff**

We will ensure that:

The School operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children.

All staff receive at induction and ongoing annual information about the School's safeguarding arrangements including for online safety in addition:

- Keeping Children Safe in Education Part 1 & 5 and Annex B (further Information)

- Safeguarding & Child Protection Policy, Child-on-Child Abuse Policy, ESafety Policy
- Behaviour Policy and Anti-Bullying Policy
- Staff Behaviour Policy (Staff Code of Conduct)
- Low-level Concern Policy
- Whistleblowing Policy
- Children who are absent from education/Children Missing from Education – school and local authority guidelines
- Role of the DSL(including the identity of the DSL and the deputies) Annex C, KCSIE

All staff receive safeguarding and child protection training at induction in line with advice from KentSafeguarding Children which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually.

Training must be renewed every three years. Staff, including those in Early Years undertake termly refresher training during any three-year period to help maintain basic skills and keep up to date with any changes to safeguarding procedures, specific to Early Years, or as a result of any safeguarding concerns that occur in the setting.

The Safeguarding Policy is made available via the school website and that parents/carers are made aware of it.

All staff in the EYFS setting keep personal mobile phones and other electronic devices with imaging and sharing capabilities out of sight and away from pupil access. (ESafety and Staff Code of Conduct Policies)

All members of staff are trained in and receive regular updates in online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and reporting concerns during term time. Out of hours filtering and monitoring only applies to staff, and Year 7 & 8 technology.

All staff and Governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse, neglect and exploitation.

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding Policy and reference to it in the Parent Handbook.

We provide a co-ordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.

Community users organising activities for children are aware of the School's Safeguarding Policy, guidelines and procedures.

The name of the designated members of staff for child protection, the Designated Safeguarding Lead and Deputies, are clearly advertised in the School with a statement explaining the School's role in referring and monitoring cases of suspected harm and abuse, neglect or exploitation.

All staff will be given a copy of Part 1 and Annex B of Keeping Children Safe in Education and will sign to say they have read and understood it.

## **7 - Roles and Responsibilities**

### **Whole School approach to safeguarding**

The Governors ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies operate with the best interests of the child at their heart. Where there is a safeguarding concern, governors and the senior leaders ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and are promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. (Particularly in the case of pupils reporting child on child abuse).

### **All School Staff:**

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- Provide a safe environment in which children can learn.
- Maintain an attitude of 'it could happen here' with regards to safeguarding.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the School whom they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Know how to respond to a pupil who discloses harm or abuse following training of 'Working together to Safeguard Children' (2023), and 'What to do if you are worried a child is being Abused' (2015).
- Are trained in how to manage a report of child-on-child sexual violence and sexual harassment.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to the KSCMP, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Kent Safeguarding Children and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to 'keep a secret'.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of early help, and be prepared to identify and support children who may benefit from early help.
- Will identify children who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the School's pastoral support process or an early help assessment). In some circumstances it may be appropriate for a member of school staff to act as the Lead Professional in early help cases.
- Undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, including online safety,

that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

- Liaise with other agencies that support pupils and provide early help.
- Know who the DSL and Deputy DSLs are and know how to contact them.
- Have an awareness of the role of the DSL, the School's Safeguarding Policy, Behaviour Policy (pupils), the Staff Code of Conduct and KCSIE Part 1 and Annex B, and procedures relating to the safeguarding response for children who go missing from education.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Council and Head in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

### Opportunities to teach safeguarding

Governors ensure that all staff support the teaching of children regarding safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed. We consider all of this as part of providing a broad and balanced curriculum.

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

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

**commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group <https://apwg.org/>

Governors ensure online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils). The statutory guidance can be found here:

Statutory guidance: [relationships education relationships and sex education \(RSE\) and health education.](#)

The DfE has produced a one-stop page for teachers, which can be accessed here: [Teaching about relationships sex and health.](#)

This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help us understand and teach about safeguarding:

DfE advice for schools: [teaching online safety in schools](#);

UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#);

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#);

The UKCIS [external visitors' guidance](#) will help schools to ensure the maximum impact of any online safety sessions delivered by external visitors;

National Crime Agency's CEOP education programme: [Thinkuknow](#);

Public Health England: [Rise Above](#)

[Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Whilst it is essential that we ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

We are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems we use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from us (if anyone) their child is going to be interacting with online.

### **The Head**

In addition to the role and responsibilities of all staff the Head will ensure that:

- The School fully contributes to inter-agency working in line with 'Working Together to Safeguard Children' 2023.
- The Safeguarding & Child Protection Policy and its procedures are implemented and followed by all staff.
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and the Deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities for a coordinated offer of early help when additional needs of children are identified
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- With the DSL ensure adequate and appropriate cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff are dealt with in accordance with

guidance from Department for Education (DfE), [Kent Safeguarding Children Multi-Agency Partnership](#). 'Lower level' concerns and allegations that do not meet the harms test should be addressed as set out later in this policy and in more depth in the Low-Level Concern Policy.

- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the [Teacher Regulation Agency](#) where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

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

In addition to the role and responsibilities of all staff the DSL will:

The DSL should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

- Holds the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place during term time) in the School, this responsibility is not able to be delegated.
- Is able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- Will have an 'it could happen here' approach to safeguarding.
- Will liaise with the local authority and work in partnership with other agencies in line with 'Working Together to Safeguard Children' and Keeping Children Safe in Education.
- Will manage and submit a referral for a child if there are concerns about suspected harm or abuse, to the **Kent Safeguarding Children Multi-agency Partnership (KSCMP)**, and act as a point of contact and support for school staff. Referrals should be made safe and securely to: <https://www.kent.gov.uk/singlerequestupload> using the [Single Request for Report Form](#).
- Will refer cases to the Channel programme where there is a radicalisation concern via the KSCMP and act as a point of contact and support for staff to discuss concerns.
- Will refer cases where a crime may have been committed to the Police as required.
- Will liaise with the case manager and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Will follow DfE and KCSIE guidance, 'Child on Child Abuse', when a concern is raised that there is an allegation of a pupil abusing another pupil within the School.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community. The DSL must ensure that they are raising awareness with colleagues about the pupils with mental health issues, and also those pupils who are open to social work, so that staff can consider the additional barriers these children may face with engaging with school.
- Will encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Will access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Will have a secure working knowledge of KSCMP procedures and understands the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Will have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.

- Will understand and support the School's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Will liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCo) on matters of safety and safeguarding and consult the KSCMP Levels of Need document to inform decision making and liaison with relevant agencies.
- Will be alert to the specific needs of children in need, those with SEND and young carers.
- Will understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Will keep detailed, accurate records (either written or using the Engage Portal, which meets the standard of appropriate secure online software). These records will include all concerns about a child even if there is no need to make an immediate referral, as well as the rationale for decisions made and action taken.
- Will ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.
- Will ensure that when a pupil transfers school, their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Will ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or ongoing.
- Will ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed.
- Will ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Will report to the Head any significant issues for example, use of the [KSC multi-agency escalation procedures](#), enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- Will ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Will ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding Policy, the Rose Hill School Code of Conduct, the Behaviour Policy (pupils) and Keeping Children Safe in Education (KCSIE) Part 1 and Annex B, and ensure that the policies are used effectively.
- Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and Governors, the Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm and abuse, neglect or exploitation will be made and the role of the School in this.
- Establish and maintain links with KSCMP safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

- Will contribute to and provide, with the Head and Chair of Governors, the 'Audit of Safeguarding' to be submitted annually to WCPS Governor Sub-Committee.
- Will ensure that the name of the designated members of staff for Child Protection, the DSL and deputies are clearly advertised in the School, with a statement explaining the School's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education.

### **The Deputy Designated Safeguarding Leads (DDSLs)**

In addition to the role and responsibilities of all staff, the Deputy DSLs will:

- Be trained to the same standard as the DSL and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, a DDSL will assume all of the functions above.

### **Record Keeping**

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

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

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

### **Manage referrals**

The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

### **Work with others**

The DSL is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the head to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a school) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

### **Training**

The DSL (and deputies) have undergone training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DSL has undertaken Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills is refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case
- conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners;
- information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. We have clear powers to share, hold and use information for these purposes;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses;
- and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

### **Raise Awareness**

The DSL should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

### **Child protection file**

Where children leave the school the DSL ensures their child protection file is transferred to the new school as soon as possible. This is transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. When receiving child protection files, we ensure the designated safeguarding leads and SENCO is aware as required.

In addition to the child protection file, the DSL considers if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information

that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

### **Availability**

During term time the DSL (or a deputy) is always available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) is expected to be available in person, and exceptional circumstances availability via phone.

### **Governors**

All members of the Governing Council have a strategic leadership responsibility for the School's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in the School is effective and comply with the law at all times. The Head ensures that the policies and procedures, adopted by the Governing Council (particularly those concerning referrals of cases of suspected abuse, neglect and exploitation), are understood, and followed by all staff. All members of the Governing Council understand and fulfil their responsibilities to ensure that:

- The School has effective safeguarding policies and procedures including a Safeguarding Policy, a Staff Code of Conduct, a Behaviour Policy (pupils) and a response to children who go missing from education. Ensure policies are consistent with Kent Safeguarding Children and statutory requirements, are reviewed annually and that the Safeguarding Policy is available on the school website.
- Where a school has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at [GOV.UK](https://www.gov.uk).
- The Governing Council have a senior board level (or equivalent) lead to take leadership responsibility for the School's safeguarding arrangements.
- The Governing Council ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- Governing Council are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010 22, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

### **Human Rights Act 83**

- The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.
- Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. The specific convention rights applying to schools are:
  - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
  - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
  - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and Protocol 1,
  - Article 2: protects the right to education.
- Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com).

**Equality Act 2010**

- Schools have obligations under the Equality Act 2010 (the Equality Act).
- According to the Equality Act, schools must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools in relation to safeguarding and promoting the welfare of children, governing council should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.
- Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children, including those with long term conditions. We could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.
- Guidance to help us understand how the Equality Act affects us and how to fulfil our duties under the act can be found at [Equality Act 2010: advice for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/equality-act-2010-advice-for-schools), it may also be useful for schools. For further information [Equality Act guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/equality-act-guidance).

**Public Sector Equality Duty**

- The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools, advice on this – including on specific duties, is set out in the advice linked above.
- The PSED places a general duty on us to have, in the exercise of our functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.
- 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 specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important that we are conscious of disproportionate vulnerabilities and integrate this into our safeguarding policies and procedures. For further information please see [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/technical-guidance-on-the-public-sector-equality-duty-england).
- The KSCMP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we should be doing all that we reasonably can to limit children's exposure to the above risks from the School's IT system. As part of this process, we should ensure our School has appropriate filters and monitoring systems in place and regularly review their effectiveness. We should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing Council should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

- Whilst filtering and monitoring is an important part of the online safety picture for pupils at Rose Hill, it is only one part. Governors have considered a whole school approach to online safety. The use of mobile technology in the school is made clear in our Esafety policy. Many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular and we carefully consider how this is managed.
- The School is directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. In addition, schools should consider meeting the Cyber security standards for schools GOV.UK. Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK.
- Whilst it is essential to ensure that appropriate filters and monitoring systems are in place, we are careful that "over blocking" does not lead to unreasonable restrictions as to what pupils can be taught with regard to online teaching and safeguarding.
- That the School operates a safer recruitment procedure that includes statutory checks on governors and staff suitability to work with children (including online searches before shortlist interview and enhanced DBS) and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training. (DBS does not charge for checks on volunteers). Please see Safer Recruitment Policy
- That at least one member of the Governing Council has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education Part 1 and Annex B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- That all staff, including temporary staff and volunteers, are provided with the School's Safeguarding Policy and Staff Code of Conduct.
- That the School has procedures for dealing with allegations of abuse against staff (including the Head), supply teachers and support staff, volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (TRA) (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- That a nominated Governor for safeguarding is identified.
- That a member of the senior management team has been appointed by the Governing Council as the Designated Safeguarding Lead who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and their deputies undertake interagency training (KSCMP Modules 1 & 2) and also undertake DSL 'New to Role' and 'Update' training every two years.
- That children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through the Wellbeing Programme, which includes within it Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE).
- That the School will comply with DfE's and Kent County Council's [Children Missing Education](#) requirements.
- That the School will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- That appropriate online filtering and monitoring systems are in place.
- That enhanced DBS checks (without barred list checks, unless the Governor is also a volunteer at the School) are in place for Governors.
- That any weaknesses in safeguarding are remedied immediately.

## 8 - Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2015\) guidance](#).

The DSL must understand fully and convey to staff the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation. Our Governors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance ['For Organisations'](#) which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information. All staff must understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners. Information will be shared with staff within the School who 'need to know'.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Head or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

## 9 - Child Protection Procedures

The following procedures apply to all staff working in the School and will be covered by training to enable staff to understand their role and responsibility. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

### **If a member of staff suspects abuse, neglect or exploitation, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:**

- Make an initial record of the information related to the concern.
- Report it to the DSL immediately.
- The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
- Make an accurate record (which may be used in any subsequent court proceedings) as

soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:

- Dates and times of their observations
- Dates and times of any discussions in which they were involved.
- Any injuries
- Explanations given by the child / adult
- Rationale for decision making and action taken
- Any actual words or phrases used by the child
- The records must be signed and dated by the author (or equivalent on Engage).
- In the absence of the DSL or a DDSL, **staff must be prepared to refer directly to KSCMP (and the police if appropriate)** if there is the potential for immediate significant harm.

**NB: A referral regarding significant harm must be made immediately or at least within 24 hours**

#### **Following a report of concerns, the DSL must:**

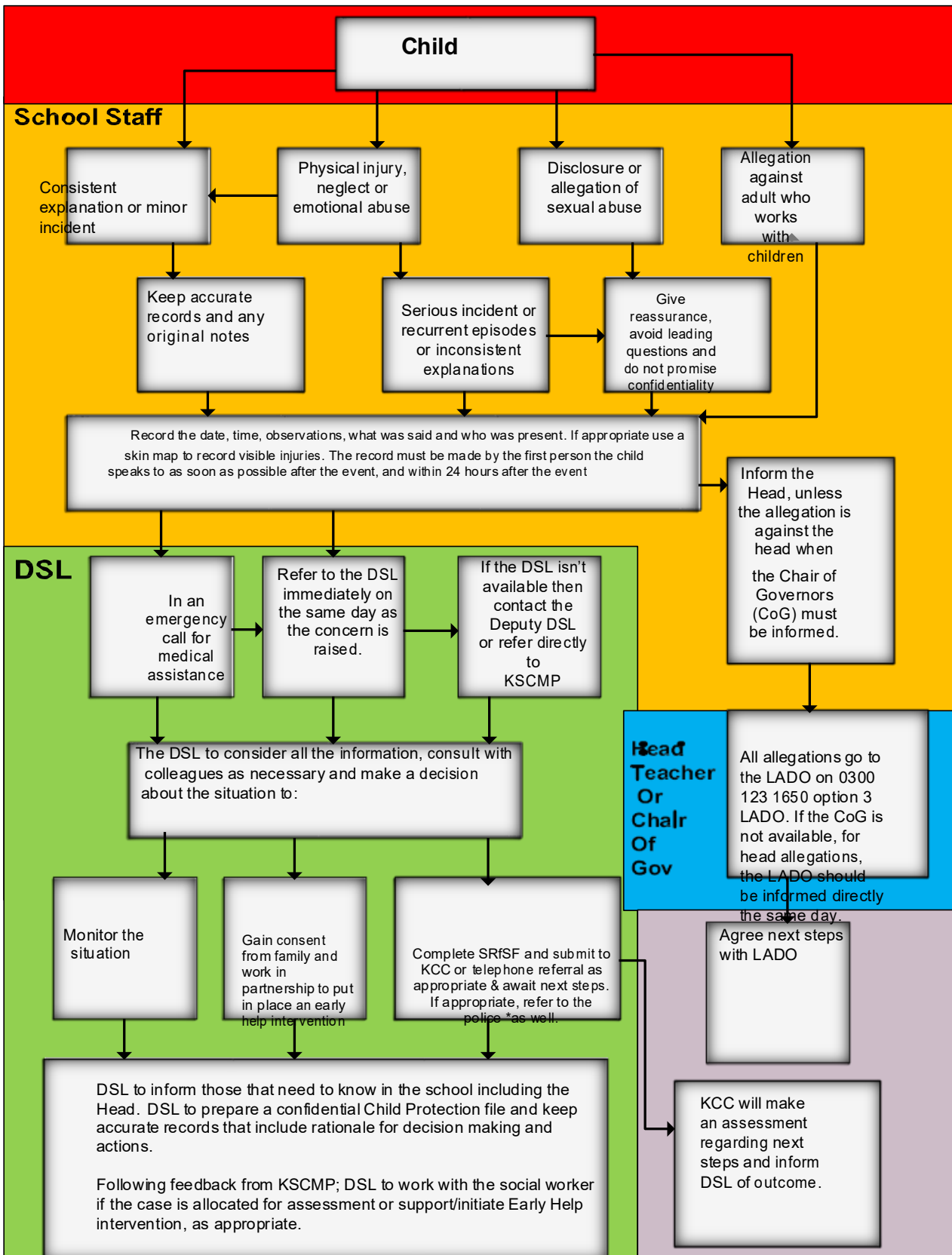
Using the [KSCMP Levels of Need](#), decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the KCC and the police if it is appropriate.

Normally the School should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the KCC. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the KSCMP. By sending a [Single Request for Support Form](#) by email to: <https://www.kent.gov.uk/singlerequestupload>. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify KSCMP of the occurrence and what action has been taken

- If the DSL feels unsure about whether a referral is necessary they can phone the KSCMP to discuss concerns.
- If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help.
- Where there are doubts or reservations about involving the child's family, the DSL should clarify with the KSCMP or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
- When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputies should take the child to the accident and emergency unit at the nearest hospital, having first notified the KSCMP. The DSL should seek advice about what action the KSCMP will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
- The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

**Child Protection Procedures Flowchart**



*\* In the cases of known FGM, the teacher who was made aware will also make contact with the police*

## 10 - Dealing with disclosures

### All staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable.

**If the disclosure is of abuse, staff must not investigate. Report, as per guidance below.**

All staff have the right to make a referral to the KSCMP or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol - for example, were they the only adult on school premises at the time and have concerns about sending a child home.

### Guiding principles: the seven Rs

#### Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

#### Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

#### Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

#### Report

- Share concerns with the DSL immediately
- If you are not able to contact your DSL or a Deputy DSL, and the child is at risk of immediate harm, contact the KCC or Police, as appropriate directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

#### Record

- If possible make some very brief notes at the time, and write them up as soon as possible

- Keep your original notes on file
- Record the date, time, place, person's present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

### Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it

### Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

### What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Head or the Safeguarding Governor of the School and/or may contact the KSCMP.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

## 11 - Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors

The School has a procedure for dealing with safeguarding concerns or allegations against those working in or on behalf of school in a paid or unpaid capacity, this includes, members of staff, supply teachers, volunteers and contractors.

This part of the guidance has two sections covering the two levels of allegation/concern:

1. Allegations that may **meet** the harm threshold.
2. Allegations/concerns that **do not meet** the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.

These procedures are consistent with local safeguarding procedures and practice guidance.

### Procedure for concerns that meet the threshold

This procedure should be used in all cases in which it is alleged a member of staff, supply staff or volunteer, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of

- harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff, supply staff or volunteer to the Head immediately.
- Whilst we are not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified, so any potential patterns of inappropriate behaviour can be identified. Governing bodies will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.
- If an allegation is made about a member of staff and it is deemed that there is a conflict of interest between the Head and that member of staff, the LADO should be contacted directly.
- If an allegation is made against the Head, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly. **The Head must not be informed prior to contact with the Chair or the LADO.**
- There may be situations when the Head or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Head or Chair of Governors they will contact the LADO on 03000 41 08 88. Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk). immediately and before taking any action or investigation.
- Following consultation with the LADO, inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the School will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care and/or the police. If the matter is investigated internally, the LADO will advise the School to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' and the KSCMP procedures.

If we, as the employer, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on [GOV.UK](https://www.gov.uk).

What staff should do if they have safeguarding concerns about another staff member who may pose a risk of harm to children.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:

- this should be referred to the head;
- where there are concerns/allegations about the head, this is referred to the chair of governors;

### **Concerns that do not meet the harm threshold**

Our Governors have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting

checks undertaken. We have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

**Low-level concerns** – for full guidance please refer to the Low-Level Concern Policy which can be requested from the Head. As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

All low-level concerns should be reported to the Head. The Head is the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL, the Head may wish to consult with the DSL and take a more collaborative decision-making approach.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If we are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

**Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported. If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then this should be referred to the Head.**

#### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the paragraph below.

*This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school. This guidance should be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:*

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

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- or,
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold are shared responsibly and with the Head or Chair of Governors, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

### **Reporting**

Should a low-level concern has be raised by a third party, the Head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

Reports of low-level concerns should be recorded in writing (forms and guidance are found in the Low-Level Concern Policy), with details of the concern, the context in which it arose and action taken. The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.

Records of low-level concerns should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The School will consider if any wider cultural issues in School that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken must be recorded.

For further information please read our Low-Level Concern Policy.

### **12 – What is Child Abuse? (see Appendices 1 – 4 for indicators of abuse)**

Abuse, neglect and exploitation are forms of maltreatment of a child including where they see, hear, or experience its effects. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. ‘

The following definitions are taken from *Working Together to Safeguard Children (2023)*. In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, through honour-based abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Kent Support Levels Guidance Sheet](#).

#### **Physical abuse**

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**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

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

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing 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.

[The KSCMP Neglect Strategy](#) and the [Neglect Guide](#) is available to provide a more detailed information regarding neglect.

## **13 Child on Child Abuse/ Child on child sexual violence and sexual harassment**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in the schools it does not mean it is not happening, it

may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their DSL (or deputy).

For further information, please see our Child-on-Child Abuse Policy.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (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, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school’s policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Our Governors ensure that the Child-on-Child Abuse policy includes:

- procedures to minimise the risk of child-on-child abuse;
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously;
- how allegations of child-on-child abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported;
- a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported;
- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children;
- recognition that it is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously; and
- the different forms child-on-child abuse can take, such as:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment.

The section on Sexual violence and sexual harassment between children in schools sets out how we respond to reports of sexual violence and sexual harassment:

- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery): the policy should include our approach to it. The DfE provides Searching Screening and Confiscation Advice. The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals.

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. Child-on-child abuse often has a gendered nature, but **all** child-on-child abuse is unacceptable and will be taken seriously.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and or/persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Advice and Guidance can be found from [UKCIS](#).

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. The school recognizes the vulnerability of children with SEN/D, including their vulnerability with regard to child-on-child abuse. We have clear processes for how victims, perpetrators and any other child affected will be supported; they will be heard properly and the reasons behind the behaviour addressed in line with our Behaviour and Anti- Bullying Policy.

The threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding policy is subject to Kent protocols when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. Any such abuse will be referred to local agencies. In the event of disclosures about pupil-on-pupil abuse all children involved, whether perpetrator or victim, are treated as being 'at risk'.

### **Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved in serious crime. These may include increased absence from school, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools is provided in the Home Office's 'Preventing youth violence and gang involvement', '[Advice to schools and colleges on gangs and youth violence](#)', 2015 and '[Criminal exploitation of children and vulnerable adults: county lines](#)', 2018. All these indicators should be reported to the DSL Team.

### **Sexual Violence and Sexual Harassment: Context**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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 education attainment as well as their emotional wellbeing. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult pupils and school staff are supported and protected as appropriate.

### **Policy**

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school. We recognise that children are capable of abusing their peers and this will be dealt with under our Safeguarding Policy and in line with KCSIE. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

We minimise the risk of child-on-child abuse by:

### **Prevention**

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the School's Behaviour Policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

### **Responding to reports of sexual violence and sexual harassment**

- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- If the report includes an online element staff will be mindful of the [Searching, Screening and Confiscation: advice for schools \(DfE 2018\) guidance](#).
- Staff taking the report will inform the DSL or the Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).

- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral Single Request for Support Form will be made to the KCC by uploading the form to:  
<https://www.kent.gov.uk/singlerequestupload>

### **Risk Assessment**

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. It will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the School.
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the School's approach to supporting and protecting pupils. Support regarding risk assessments can be accessed from the Education Safeguarding Team – **West Kent**: Worrall House, 30 Kings Hill Avenue, West Malling, Kent, ME19 4AE: 03000 41 22 84

### **Action - the DSL will consider:**

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

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the School's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or School staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

### **Options - the DSL decision making regarding the issue will entail the following options:**

- Manage internally
- Early Help intervention
- Refer to KSCMP
- Report to the police (generally in parallel with a referral to KSCMP)

**Children sharing a classroom: Initial considerations when the report is made**

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. However, reports of rape and assault by penetration are likely to be especially difficult for the victim, and close proximity to the alleged perpetrator(s) is likely to be especially distressing.

Whilst the school establishes the facts of the case and starts the process of liaising with local authority children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school will also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately. In all cases, the initial report should be carefully evaluated, reflecting the considerations set out above.

The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

**Ongoing Response**

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- In line with managing internally, the School may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the DSL (and their deputies) know what the local early help process is and how and where to access support.
- Multi-agency early help will work best when placed alongside our strong School policies, preventative education and engagement with parents.
- The School, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document. The KSCMP threshold chart is published in our staff rooms and staff are regularly reminded of procedures.
- Early help and the option to manage a report internally do not need to be mutually exclusive: we manage internally and seek early help for both the victim and perpetrator(s). Whatever the response, it is under-pinned by the principle that there is zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the School will take suitable action. In all but the most exceptional of

circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

- Where a criminal investigation into sexual assault leads to a conviction or caution, the School will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at Rose Hill School, the Head should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other affected children & adults will receive appropriate support and safeguards on a case-by-case basis.
- The School will take any disciplinary action against the alleged perpetrator in accordance with the School's Behaviour Policy.
- The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

### **Physical Abuse**

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils are also abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

References:

[DfE Keeping Children Safe in Education 202](#)

[DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges, Sept 2021](#)

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#). The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## **14 - Harmful Sexual Behaviour**

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The School recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

The [Brook Traffic Light Tool](#), profiled by age group, and a link can be found in the appendices of this document:

### **15 - Anti-Bullying & Cyberbullying**

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. The [Kent Anti Bullying Strategy and guidance](#) provides further resources for school staff.

We keep a record of known bullying incidents which is shared with, and analysed by, the Governing Council. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Head and the DSL will also consider child protection procedures.

The School's Wellbeing Programme (which includes PSHEE and RSE) regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

### **16 - Online Safety**

The School has an online safety policy (ESafety) which explains how we try to keep pupils safe in school and how we respond to online safety incidents.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

The appropriateness of any filtering and monitoring systems are a matter for the School and will be informed in part, by the risk assessment required by the Prevent Duty. The Department for Education has published filtering and monitoring standards which set out that we should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems **during term time (in real time) and at regular intervals for staff and Year 7 & 8 technology through non-term times.**

- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet our safeguarding needs

The Governing Council reviews the standards and discuss with IT Manager and the DSL what more needs to be done to support the School in meeting this standard. The DSL reports termly to the Governors.

An effective whole school approach to online safety empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

**commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

- We ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures, including filtering and monitoring. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL, staff induction and any parental engagement.
- LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

### What is The Dark Web Explained?

This resource has been developed by the National Crime Agency in collaboration with [The Children's Society](#) and [Marie Collins Foundation](#) in response to recommendations from professionals and from research which found that many professionals, parents and carers do not understand the Dark Web and feel unequipped to talk to a young person about it should the need arise. The Dark Web explained consists of a short informational film with a separate fact sheets for professionals and parents and carers. The resource can help you to:

- understand what the Dark Web is
- know why and how some young people might access the Dark Web
- feel confident having conversations and supporting young people who are accessing the Dark Web

How should it be used?

The film and fact sheets have been created to help teacher support pupils in understanding more about the Dark Web to enable them to feel confident and better equipped to have conversations with young people who are using the Dark Web, if required:

<https://www.thinkuknow.co.uk/professionals/resources/dark-web-explained/>

Further information can be access through '[Teaching Online Safety](#)', 2019 and UKCCIS's '[Education for a Connected World](#)'. The School Esafety coordinator is Imogen Scarbrough, DSL and Deputy Head.

### 16c Mobile Phones and iPads

This procedure includes all staff, including those in the EYFS setting. Personal mobile phones should be switched off whilst teaching (and/or on duty) and should not be used in front of pupils; however, the exception applies if required for School business or in other exceptional circumstances. Personal calls on a mobile phone may be made in the staffroom or in the classroom during a break time when children are not present. Personal mobile phones should be out of sight of the pupils. Private mobile phones must not be used to take photos of the children or record the children without the prior knowledge and permission of a member of the Senior Leadership Team. Any images of the children must be downloaded at the first available opportunity on to the School system and then deleted from the mobile phone. Staff may keep their mobile telephones switched on for emergencies when off site on School business. SMART watches may not be worn.

### 16c Cyber Crime

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

### 17 - Racist Incidents

Our policy on racist incidents is set out in our Anti-Bullying Policy, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents within our Anti-Bullying Log.

### 17b - Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - [GOV.UK](#). In addition, May 2023 with the addition of [Guidance: Child Modern Slavery and Human Trafficking \(RCPCH\)](#).

### 18 - Radicalisation and Extremism (see Appendix 5 for indicators of vulnerability)

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due

regard to the need to prevent people from being drawn into terrorism.

Note: This preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024, [Statutory guidance, Prevent duty guidance: for England and Wales](#).

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

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are [factors that may indicate concern](#). It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) [making a Prevent referral](#).

Some children are at risk of being radicalised, adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

The School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the School follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

The Governors, the Head and the Designated Safeguarding Lead will assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the School's profile, community and philosophy. Where services or activities are provided separately by another body using the school premises, the Head will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved then an

application to use premises will be refused.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak to the DSL. They should then follow the safeguarding procedures and refer cases to KSCMP. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101 and ask to speak to the Kent Police Prevent Coordinator.

The Department of Education has also set up a dedicated telephone helpline for staff and Governors to raise concerns around Prevent (020 7340 7264).

### **18b – Additional Support**

The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

[Prevent awareness e-learning](#) offers an introduction to the Prevent duty.

[Prevent referrals e-learning supports staff](#) to make Prevent referrals that are robust, informed and with good intention.

[Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation. For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals. The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors members outlining their roles and responsibilities under the duty.

### **19 - Domestic Abuse**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The school is enrolled in the [Operation Encompass](#) scheme, a joint project between Kent Police, Kent County Council, Kent Domestic Abuse Service and Kent Schools; where every school day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse. Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Information is shared by the police with a school's trained Key Adult (DSL) prior to the start of the next school day after officers have attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the child. Children experiencing domestic abuse are negatively impacted by this exposure; domestic abuse has been identified as an Adverse Childhood Experience and can lead to emotional, physical and psychological harm. Operation Encompass aims to mitigate this harm by enabling immediate support, making a child's day better and giving them a better tomorrow.

Operation Encompass believes that children are victims of domestic abuse in their own right and should be acknowledged as such, [Domestic Abuse Act 2021](#).

### **19b Homelessness**

Homelessness Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

### **20 - Child Exploitation (CSE) and Child Criminal Exploitation (CCE)**

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

#### **Child Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including

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

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

Further information about CSE including definitions and indicators [click here](#).  
Further information can be found here: <https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/>

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology e.g. through others sharing videos or images of them on social media. All staff are aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The School is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

The DSL will complete the Kent Safeguarding Children [CSE Screening Tool](#) alongside staff who know the child well on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern (green, amber or red) the DSL should contact the **KSCMP** and email the completed CSE Screening Tool along with a completed [Single Request for Support Form](#). If a child is in immediate danger the police should be called on 999.

The School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

For further information on prevention: <https://www.childrensociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation>

### **Child Criminal Exploitation (CCE)**

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of

protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

The school includes the risks of sexual exploitation in the Wellbeing Curriculum (which includes the PHSEE and RSE curriculum). Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

### **'Say Something If You See Something'**

Kent has recently launched a campaign to raise awareness of child sexual exploitation called Operation Willow. If you have concerns about a child or young person whom you believe is at risk of sexual exploitation please call Kent Police on **101** quoting Operation Willow. You can also contact the National Child Sexual Exploitation Helpline on **11 60 00**. For more information please click [here](#)

### **Child Criminal Exploitation and Gangs**

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that we provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed

without delay to the DSL. The School is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and must make reasonable enquiries with the child and parents to assess this risk.

A referral to the **KSCMP** will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the KSCMP. If there is concern about a child's immediate safety, the Police will be contacted on 999.

## **21 - Youth produced sexual imagery (sexting)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance: '[Sexting in schools and colleges: responding to incidents and safeguarding young people](#)'.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the KSCMP or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are

unusual for the child's development stage or are violent.

- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Head, to respond to the incident without referral to the KSCMP or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After or Previously Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the KSCMP or the Police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

## **22 - So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

### **Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men,

domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, Marriage and Civil Partnership (Minimum Age) Act 2022 raised the age of marriage and civil partnership to 18 in England and Wales, with effect from 26 February 2023.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#) School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

### **Female Genital Mutilation (FGM)**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in school who is employed or engaged to carry out 'teaching work' in the School, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher 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 the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the School's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

### **23 - One Chance Rule**

All staff are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have 'one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The School is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their

responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

#### **24 - Private Fostering Arrangements**

A [private fostering](#) arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The School recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify the KSCMP.

#### **25 - Looked after children and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The School ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and child's contact arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher and Governor for children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role. The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the Kent County Council's Head of Virtual School (Head teacher - Tony Doran). The role of the Virtual School Head includes a non-statutory responsibility to promote the educational achievement of all children in kinship care.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Assistant Head to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the School and meet the needs of the child within their individual learning plan.

#### **25b – Children with special educational needs, disabilities or health issues**

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The Governing Council ensure our child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- 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 the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the DSL (or a deputy) and the SENCO.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the department's:

- [SEND Code of Practice 0 to 25 and Supporting Pupils at School with Medical Conditions.](#)

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service:

[councilfordisabledchildren.org.uk](http://councilfordisabledchildren.org.uk)

- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- NSPCC - [Safeguarding children with special educational needs and disabilities \(SEND\)](#) and NSPCC - [Safeguarding child protection/deaf and disabled children and young people](#)

### **25c - Children who are lesbian, gay, bi, or trans (LGBT)**

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We will refer to 'Guidance for Schools and Colleges in relation to Gender Questioning Children', when deciding how to proceed.

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

## 26 - Children Missing Education

All staff should be aware that children being absent from school and children missing education, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of the school's unauthorised absence procedures and children missing education procedures.

All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The School recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible the School will hold more than one emergency contact number for each pupil. The School will ensure that there is a record of joiners and leavers as defined in [The School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#).

When removing a child's name, the School will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the School Register.

The School will must make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the School Register, [The School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#), where school absence indicates safeguarding concerns.

The School will:

- Enter pupils on the admissions register on the first day on which the School has agreed, or has been notified, that the pupil will attend the School.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the LA procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the School.
- The School will notify the Local Authority when they are about to remove a child's name from the School Register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the School, in writing, of their intention to electively home educate the School will forward a copy of the letter to the Elective Home Education Team / Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the School will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that we respond to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- Guidance on school attendance 'Working together to improve school attendance' including information on how schools must work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding the Schools' duties regarding children missing education, including information we must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- general information and advice for the School can be found in the Government's [Missing Children and Adults Strategy](#).

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

Further to the information above, many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Following [The School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#) the school must inform the LA of all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from the school with a view to educating at home, we work together with the LAs, and other key professionals to coordinate a meeting with parents/carers where possible. This requirement does not apply where a pupil's name is deleted after they have completed the final year at the school (e.g., Year 6 and 8) unless the local authority have asked to be informed about such deletions. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE.

The Elective Home Education materials that KSCMP can be accessed / found on the KSCMP website. Elective Home Education factsheet can be found here - [www.kscmp.org.uk/training/factsheets](http://www.kscmp.org.uk/training/factsheets)

The Elective Home Education guidance for professionals can be found here - Supporting Resources - [www.kscmp.org.uk/training/training-resources](http://www.kscmp.org.uk/training/training-resources)

### **27 - Pupils Missing Out on Education**

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

- The School will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable;
- The School will ensure that parents (and the local authority where the pupil has a statement of special educational needs) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;
- The School will keep the placement and timetable under review and involve parents in the review.
- Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it;
- The School will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child;
- The School will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable;
- The school leadership will report to Governors of any formal direction of a pupil to alternative provision to improve behaviour;
- The school leadership will report to Governors information regarding the use and effectiveness of the use of alternative provision and modified timetables.
- Where we place a pupil with an alternative provision provider, we will continue to be responsible for the safeguarding of that pupil.
- We will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

## **28 - School Attendance and Behaviour**

Additional policies and procedures are in place regarding school attendance and behaviour.

The School recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The School will work in partnership with Kent Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **29 - Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is or at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in 'Positive Options' techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the School will consider the risks, given the additional vulnerabilities of these children.

Kent County Council guidance [Restrictive Physical Intervention](#) provides further detailed information.

### **30 - Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the School they should speak in the first instance to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistle-blowing regarding the Head should be made to the Chair of Governors whose contact details are available to staff.

### **31 - Use of school premises for non-school activities**

The School hires or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the school, under the direct supervision or management of their school staff, our arrangements for child protection will apply.

However, where services or activities are provided separately by another body this is not necessarily the case. The Governing Council should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The Governing Council should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

### **Organisations or Individuals using school premises**

The School may receive an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we follow our safeguarding policies and procedures, including informing the LADO.

### **32 – Further Safeguarding Advice: links to useful websites:**

Further advice on safeguarding and child protection is available from: [Kent County Council](#)

[Education Safeguarding Team](#)NSPCC: <http://www.nspcc.org.uk/>ChildLine: <http://www.childline.org.uk/pages/home.aspx>CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>Beat Bullying: <http://www.beatbullying.org/>Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>Safer Internet Centre <http://www.saferinternet.org.uk/>Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>**Legislation, Statutory Guidance and Government Non-Statutory Guidance**[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)[Sexual Violence and Sexual Harassment between Children in Schools and Colleges \(September 2021\)](#)[Ofsted Review of Sexual Abuse in Schools and Colleges \(including Online\) This report is useful reading for everyone working in schools or with children and young people](#)

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Policy Author:	Emma Neville, Head
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## Appendix 1- Indicators of Physical Abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g. knees, shins.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the School.

### Indicators of physical abuse / factors that should increase concern:

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the School, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

## Appendix 2 - Indicators of Emotional abuse

Emotional abuse is difficult to define, identify/recognise and/or prove. Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects, although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic abuse. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children by the way that the adults are speaking to, or behaving towards, children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

### Developmental issues:

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

### Behaviour:

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

### Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

### Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

### Appendix 3 – Indicators of Sexual Abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation. Sexual exploitation is seen as a separate category of sexual abuse. The [KSCMP Screening Tool and guidance](#) provides school staff with information regarding indicators of CSE.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

#### Physical:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

#### Behavioural:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism

#### **Appendix 4 – Indicators of Neglect**

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors. Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging; children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused*, DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff should be discussed with the DSL.

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Physical indicators of neglect:

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect:

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

#### **Self-Neglect**

Depending on the age and capacity of the child, staff should be aware of possible self-neglect, where a child may not be following medical guidance or taking medication as prescribed. Where this is the case this should be raised as a safeguarding concern.

### Appendix 5 – Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. There is no such thing as a 'typical extremist': those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

**Identity Crisis** – the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society;

**Personal Crisis** – the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

**Personal Circumstances** – migration; local community tensions; and events affecting the pupil / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

**Unmet Aspirations** – the pupil may have perceptions of injustice or a feeling of failure,

**Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

**Special Educational Needs and Disability** – the pupil may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

Being in contact with extremist recruiters;

Accessing violent extremist websites, especially those with a social networking element;

Possessing or accessing violent extremist literature;

Using extremist narratives and a global ideology to explain personal disadvantage;

Justifying the use of violence to solve societal issues;

Joining or seeking to join extremist organisations;

Significant changes to appearance and / or behaviour;

Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance, [The Prevent Duty](#), can be accessed via this link.

**Appendix 6 - Brook sexual behaviours traffic light tool**

[https://www.proceduresonline.com/manchester/cs/user\\_controlled\\_lcms\\_area/uploaded\\_files/Brook%20Traffic%20Light.pdf](https://www.proceduresonline.com/manchester/cs/user_controlled_lcms_area/uploaded_files/Brook%20Traffic%20Light.pdf)

## **Appendix 7**

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

How to respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online. As set out in this policy, all staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse.

#### **What we should be aware of**

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. We should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (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.

Children who are victims of sexual violence and sexual harassment wherever it happens, may 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.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

#### **Sexual violence**

It is important that we are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school. When referring to sexual violence, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/133 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (we should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape. Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. We should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools.](#)
- sharing of unwanted explicit content or sexualised online bullying or unwanted sexual comments and messages, including, on social media or sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that we consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## **Harmful Sexual Behaviour**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector.

It is effective safeguarding practice for the DSL (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

## **Preventing abuse**

Effective safeguarding practice is demonstrated when schools are clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date. As such:

- if required, the DSL (or a deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school's policies (especially the child protection policy) and responses, and
- the DSL (and their deputies) should be confident as to 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 when required.

## **Responding to reports of sexual violence and sexual harassment**

Children should be able to confidently report abuse, knowing their concerns will be treated seriously.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools with the foundation for a calm, considered and appropriate response to any reports. Our Governing Council ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required.

## Support

Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The DSL (or a deputy) should lead the school response and should be aware of the local process for referrals to children's social care and making referrals to the police. National Crime Agency's CEOP Safety Centre: The CEOP Safety Centre aims to keep children and young people safe from online sexual abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors.

The NSPCC provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The helpline provides expert advice and support for school staff and will be especially useful for the DSL (and their deputies)

Support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust

The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying. Online: We recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:

The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk). The helpline provides expert advice and support for school staff with regard to online safety issues;

Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF).

Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).

National Crime Agency's CEOP Education Programme provides information for the children's workforce and parents and carers on protecting children and young people from online child sexual abuse.

LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders. Additional sources of support are listed at the end of Annex B. The immediate response to a report.

## Responding to the report

It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

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

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim

ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

All staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the DSL or a deputy)
- careful management and handling of reports that include an online element. Including being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL(or a deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
- recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- informing the DSL(or a deputy), as soon as practically possible, if the DSL(or a deputy) is not involved in the initial report. Considering confidentiality and anonymity.

### **Confidentiality**

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may

apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the DSL(or a deputy), who should consider the following:

parents or 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, and rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL(or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the DSL(or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

### **Anonymity**

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, we should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.

As a matter of effective safeguarding practice, we should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. In addition, the principles described in Childnet's cyberbullying guidance could be helpful.

### **Risk assessment**

When there has been a report of sexual violence, the DSL(or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (paper or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

The DSL(or a deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school risk assessment is not intended to replace the detailed

assessments of expert professionals. Any such professional assessments should be used to inform the school approach to supporting and protecting their pupils and students and updating their own risk assessment.

### **What to consider**

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

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, we should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

### **Options to manage the report**

It is important that schools and colleges consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to local authority children's social care and/or the police, then, as a general rule, the DSL should speak to the local authority children's social care and the police and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard its children, where required.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. The four scenarios are:

#### **1. Manage internally**

In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the

incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## **2. Early Help**

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the DSL (and their deputies) know what the local early help process is and how and where to access support. 498.

Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.

Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and designated safeguarding leads (and their deputies) will need to familiarise themselves with this document.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and alleged perpetrator(s).

Whatever the response, it should be under-pinned by the principle that there is zero-tolerance approach to sexual violence and sexual harassment and that both are never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## **3. Referrals to local authority children's social care**

Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local authority children's social care.

At the point of referral to local authority children's social care, we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of local authority children's social care.

If a referral is made, local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the school (especially the DSL (or a deputy)) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any

other children that require support.

We should not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the victim and other children in the school. It will be important for the DSL (or a deputy) to work closely with local authority children's social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be immediate.

In some cases, local authority children's social care will review the evidence and decide that a statutory intervention is not appropriate. The school or college (generally led by the DSL (or a deputy)) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm or if circumstances change. If a statutory assessment is not appropriate, the DSL (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that both are never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

#### **4. Reporting to the Police**

Any report to the police will generally be in parallel with a referral to local authority children's social care (as above). It is important that the DSL (and their deputies) are clear about the local process for referrals and follow that process.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: [When to call the police.](#)

Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

At this stage, we will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of local authority children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the DSL (and their deputies) are aware of their local arrangements.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continues to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged

perpetrator(s), it will be important for the DSL (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

If the school has questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).

Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that both are never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### **Considering bail conditions**

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.

Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI will not necessarily have conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

Whatever arrangements are in place, the school or college will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.

Particular regard should be given to the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an un-convicted person (e.g. rights to privacy, family life, etc).

Careful liaison with the police investigators should help to develop a balanced set of arrangements.

### **Managing any delays in the criminal process**

There may be delays in any case that is being progressed through the criminal justice system. The schools should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school. The risk assessment will help inform any decision.

Considering any disciplinary action against the alleged perpetrator(s) whilst an investigation is ongoing is discussed below in the alleged perpetrator(s) section.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSL (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

If the school has questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).

### **The end of the criminal process**

If a child is convicted or receives a caution for a sexual offence, the school should update its

risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school as the victim, the school should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate with regard to the lesson timetable of the perpetrator(s).

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils in the school. It will be important that the school ensures both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. The School should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience.

#### **Unsubstantiated, unfounded, false or malicious reports**

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DS should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this was a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we should consider whether any disciplinary action is appropriate against the individual who made it as per our own behaviour policy.

#### **Ongoing response Safeguarding and supporting the victim**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

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

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

The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

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

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

It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school should decide on a course of action.

Consideration should be given as to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Support can include: Early help and local authority children's social care.

Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.

Police and social care agencies can signpost to ChISVA services (where available), or referrals can be made directly to the ChISVA service by the young person or school or college. Contact details for ChISVAs can be found at [Rape Crisis](#) and [The Survivors Trust](#).

Child and young people's mental health services ([CYPMHS](#)) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CYPMHS have their own website, which will have information about access, referrals and contact numbers.

The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. [The Male Survivors Partnership](#) can provide details of services which specialise in supporting men and boys.

The NHS – [Help after rape and sexual assault](#) - NHS ([www.nhs.uk](http://www.nhs.uk)) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.

Rape and sexual assault referral centres services can be found at: [Find Rape and sexual assault referral centres](#). Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.

[Childline](#) provides free and confidential advice for children and young people. Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.

[Childline / IWF: Remove a nude image shared online](#) Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have

been shared online, to see if they can be removed from the internet.

## Appendix 8 Information and support

There is a wealth of information available to support schools and parents to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

### Advice for governing bodies and senior leaders

- [Childnet](#) provide guidance for schools on cyberbullying
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of a school online safety arrangements
- [NSPCC](#) provides advice on all aspects of a school online safety arrangements
  - [Pears Foundation](#) Countering Online Conspiracies in Schools
- [Safer recruitment consortium](#) "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
- [South West Grid for Learning](#) provides advice on all aspects of a school online safety arrangements
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided [advice on sexting-in-schools-and-colleges](#) and [using-external-visitors-to-support-online-safety-education](#)
- [County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council
- [Supporting practice in tackling child sexual abuse](#) - CSA Centre Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

### Remote education, virtual lessons and live streaming

- [Case studies](#) on remote education practice are available for schools to learn from each other
- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
- [London Grid for Learning](#) guidance, including platform specific advice
- [National cyber security centre guidance](#) on choosing, configuring and deploying video conferencing
- [National cyber security centre guidance](#) on how to set up and use video conferencing
- [UK Safer Internet Centre](#) guidance on safe remote learning

### Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content
- [CEOP](#) for advice on making a report about online abuse

### Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Government advice](#) about security and privacy settings, blocking unsuitable content, and parental controls
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- [Lucy Faithfull Foundation](#) StopItNow resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- [National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online

- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online
- Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- [Shore Space](#): for teenagers worried about sexual behaviour
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online