

Policy Document for: Safeguarding and Child Protection

Based on: Keeping Children Safe in Education DfE Guidance September 2022

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Key contact personnel in School

Trust Lead Designated Safeguarding Leads	Deputy Designated Safeguarding Leads
<ul style="list-style-type: none"> Katrine S - expiry 5/2/2023 <p>Bobbing</p> <ul style="list-style-type: none"> Kelly B - expiry Sept 23 Katrine S – expiry 5/2/23 <p>Aspire</p> <ul style="list-style-type: none"> Tracy T - expiry 06/02/23 NSPCC training completed 06/22 Neil D – expiry 18/10/23 <p>Iwade</p> <ul style="list-style-type: none"> Katrine S – expiry 5/2/23 <p>Grove Park</p> <ul style="list-style-type: none"> Katrine S – expiry 5/2/23 <p>Trust trained DSLs</p> <ul style="list-style-type: none"> Tim H – expiry Oct 2022 Tamzin W - exp June 2023 Vicky L – expiry Feb 2024 	<p>Bobbing</p> <ul style="list-style-type: none"> Gemma K – expiry 11/07/23 Lauren G – expiry Sept 23 <p>Aspire</p> <ul style="list-style-type: none"> Chris D - expiry Luke E - expiry Lynne W- expiry Linda T - expiry <p>Iwade</p> <ul style="list-style-type: none"> Paula N - expiry 10/2/2023 Lisa B – expiry 28/08/2023 Kirsty N – expiry Sept 2024 Adam Y – expiry 28/3/23 Lauren G – expiry Sept 23 <p>Grove Park</p> <ul style="list-style-type: none"> Jo G - expiry
Named Safeguarding Governors	
<ul style="list-style-type: none"> Neil Peterson – Chair of Trustees 	

Contact Details

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Bobbing & Iwade schools use CPOMS to log all concerns. Aspire & Grove Park use My Concern to log all concerns.

All staff have access to this policy and CPOMS/My Concern to sign to the effect that they have read and understood its content. These DSL contacts are also on posters around the site, and on the safeguarding leaflet at reception. Additionally, the contacts for the Local Authority and NSPCC are on posters around the site and in the head's office.

This policy will be reviewed at least annually and/or following any updates to national or local guidance and procedures reflecting KCSIE 2022.

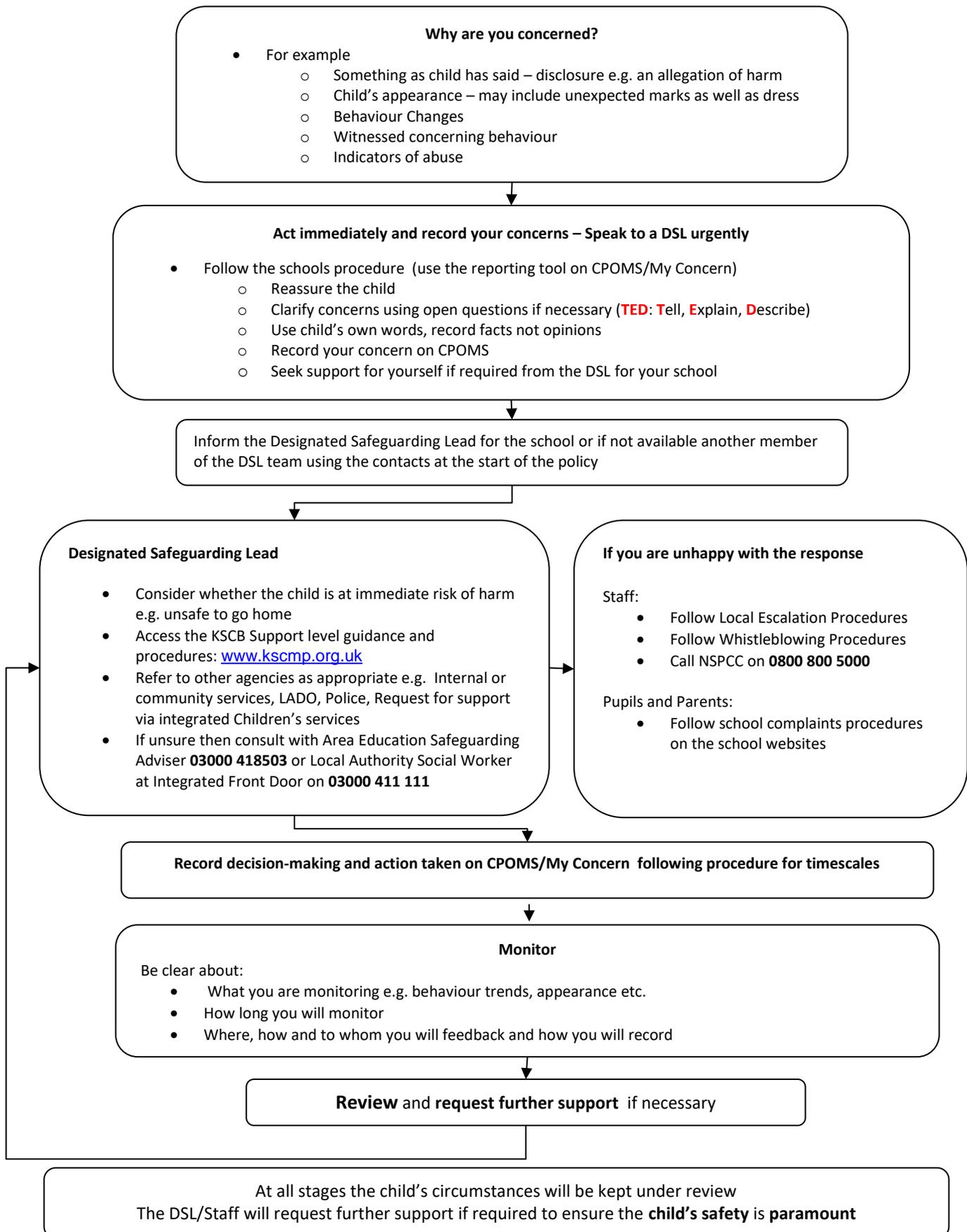
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What to do if you have a welfare concern at Iwade and Bobbing Schools



Child Focused Approach to Safeguarding

Introduction and ethos

Bourne Alliance MAT (BA-MAT) and its member schools recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everyone's responsibility. We are a community and all those directly connected (staff, volunteers, directors, governors, parents, families and pupils) are an important part of the wider safeguarding systems for children and have an essential role to play in making it safe and secure.

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

Staff working with children at any of the BA-MAT Schools will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

Each school recognises the importance of providing an ethos and environment within its schools that will help children to be safe and feel safe. In our schools, children are respected and encouraged to talk openly and enable them to feel confident that they will be listened to. At Aspire School, staff recognise many of the children in our care at the Aspire School have communication and interaction difficulties and so, whilst there may not be words to describe their worries, there may be an alternative method of communication, signs or changes in behaviour. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support and protection. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

Our core safeguarding principles are:

- The best interests of children always come first.
- It is a whole academy responsibility to safeguard and promote the welfare of children as its paramount concern
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, orientation have equal rights to protection
- All children have a right to be heard and to have their wishes and feelings taken into account when determining what safeguarding action to take and what services to provide
- All staff understand safe professional practice and adhere to our safeguarding, code of conduct and other associated policies
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance

There are four main elements to our safeguarding policy

- **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
- **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- **Support:** for all pupils, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

- **Collaborating with parents and other agencies:** to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and governors and are consistent with those of Kent Safeguarding Children Multi-Agency Partnership (KSCMP) and are consistent with those outlined within KCSIE 2022

Policy Context

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

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:

- Keeping Children Safe in Education 2022 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Ofsted: Education Inspection Framework'
- Framework for the Assessment of Children in Need and their Families 2000
- [Kent and Medway Safeguarding Children Procedures](#) (KSCMP)
- Early Years and Foundation Stage Framework 2021 (EYFS)
- The Education Act 2002
- The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)

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

Each school recognises that children experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

Each school will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary.

All Schools in BA-MAT recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

Definition of safeguarding

"Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil's welfare, health and safety." (Inspecting safeguarding in early years, education and skills, Ofsted, 2019)

In line with KCSIE 2022, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from maltreatment;
- Preventing impairment of children’s mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

Each school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Child on Child abuse
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home/Extra familiar)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

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

Related Safeguarding Policies

We are aware that child protection and safeguarding are fundamental to the welfare of all children in our care. This policy is therefore one of a series in the trust’s integrated safeguarding portfolio and should be read in conjunction with the other safeguarding policies in the Trust. These are held on SharePoint.

Policy Compliance, Monitoring and Review

The Trust group of DSL's will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2022 as appropriate. This can be found on SharePoint and a paper copy held in the staffroom at all schools (*edited 12/1/23*)

Parents/carers can obtain a copy of this Child Protection Policy and other related policies on request. Additionally, policies can be viewed on the individual school/Trust website.

The main safeguarding and child protection policy will be reviewed at least annually as a minimum. The majority of safeguarding related policies will be reviewed on an annual basis by the Governors, Trustees and leadership team, whom have responsibility for oversight of school safeguarding and child protection systems.

The Designated Safeguarding Lead / Head of School/ Head Teacher will ensure reporting on safeguarding activity and systems in school at the 4 times a year meetings to the Local Governing Body. The Governing Body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility. Additionally, from Sept 2022, a new safeguarding monitoring pair is being formed to increase monitoring, as well as Trust level safeguarding reviews at least annually.

Forest School

All staff working in BA-MAT Forest School sites will continue to follow the procedures set out in this policy.

Key responsibilities

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Schools and colleges form part of the wider safeguarding system for children.

Governors, Trustees and Leadership

The Governors and Trustees and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. They have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

The Governors and Trustees and leadership team will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

The Governors and Trustees and leadership team are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).

The Governors and Trustees and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare

The Governors, Trustees and leadership team attend annual safeguarding training and have regard to the KCSIE 2022 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times. The Governors and Trustees also ensure that the staff receive training in line with KCSIE 2022. This training is reported on the Head of School report.

The Governors and Trustees will ensure an appropriate senior member of staff, from the schools leadership team, is appointed to the role of designated safeguarding lead. The Governors and Trustees and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

The Trust has nominated lead governor/Trustee who act as the monitoring pair for safeguarding named on the front page of this document. The nominated governor will support the DSL and have oversight in ensuring that the Schools have an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies, structures supporting safeguarding children are reviewed at least annually and when required. This is further reviewed by the monitoring pair and Safeguarding Trust Review.

The Governors, Trustees and Leadership team will ensure that the DSL team are supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

The Head of School/HeadTeacher and CEO will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.

The Governors and Trustees ensure that relevant staff have due regard to the Data Protection principles and comply with the **Data Protection** policy. This is reported to the Governors and Trustees as part of the Head of School report at least annually.

Governors do not list the school(s) that they govern for on social media as part of safeguarding to protect themselves and the schools. The Governing body/Trust Board receive reports from the Heads of School, which fulfil the safeguarding and related policy requirements.

Designated Safeguarding Lead (DSL)

Each school has appointed a member of the leadership team as the Designated Safeguarding Lead (DSL) – these contacts are listed at the start of this policy. Additionally the DSL team work closely together to offer support.

The DSLs has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) at each school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

Each school also has appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence. These persons are named on the front page of this policy, and on noticeboards around school site.

The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.

It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2022. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns
- Maintaining a confidential recording system for safeguarding and child protection concerns
- Coordinating safeguarding action for individual children
 - When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaising with other agencies and professionals in line with KCSIE 2022 and WTSC 2018 (2020 update) and note this on CPOMS/My Concern
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary and recorded on CPOMS/My Concern.
- Follow up with any referrals through the digital front door not responded to within 1 working day) and note this on CPOMS/My Concern
- Representing, or ensure any Trust schools are appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
- Managing and monitoring each school role in any multi-agency plan for a child.
- Being available during term time (during school hours) for staff in to discuss any safeguarding concerns.
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities, including wrap around provision at each school.
- To ensure that records and transferred and received in line with this policy
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Informing the CEO of any significant safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019).
- Will take consideration regarding the wishes of the child, but will operate with the best interests of the child at heart

Each DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The Deputy DSLs will be trained to the same standard as the DSL. The DSLs will be updated formally every two years but their knowledge and skills will be updated through a variety of methods (*e.g. e-Bulletins, conferences, local meetings, other training etc.*) at regular intervals and at least annually.

Members of staff

Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

All members of staff have a responsibility to:

- Report any concern they have to a DSL as soon as possible – **it is everyone's responsibility**
- Understand that GDPR does **not** prevent the reporting of safeguarding concerns
- Provide a safe environment in which children can learn
- Be prepared to identify children who may benefit from early help
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.

- Understand the early help process and their role in it
- Understand our schools' safeguarding policies and systems
- Undertake regular and appropriate training which is regularly updated
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989 – [see Appendix 5 on page 67](#)
- Know what to do if a child tells them that he or she is being abused or neglected, or exploited and understand the impact abuse and neglect can have upon a child.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Know how to maintain an appropriate level of confidentiality
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection – [see Appendix 1 page 58](#)
- ensure all children are able to develop appropriate strategies to recognise and respond to risk
- take appropriate action to prevent safeguarding concerns escalating and work with other services as needed
- safeguard children's well-being and maintain public trust in the teaching professions as part of their professional duties
- Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the school safeguarding regime (this may include accessing the school whistleblowing policy)
- Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child
- Respond to and refer any concerns about children or other members of the community in accordance with this policy
- Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare
- Be alert to any child who may benefit from early help and discuss these with the SENCo, Assistant Headteacher and/or Head of School/Head Teacher (all of whom are DSL)
- Actively take opportunities to teach safeguarding such as online safety, road safety, PSHE, SRE etc
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- Act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Staff at each school recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

Staff at each school will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies

Children and young people

Children and young people (pupils) have a right and responsibility to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Contribute to the development of Iwade and Bobbing Schools safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves and others safe, including online.
- Develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online

Parents and Carers

Parents/carers have a responsibility to:

- Read and understand the relevant school/policies and procedures, encouraging their children to adhere to them, and adhere to them themselves
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches
- Identify behaviours which could indicate that their child is at risk of harm, including online and seek help and support from the school, or other agencies
- Seek help and support from the school, or other appropriate agencies, if they or their child encounters any safeguarding concern.

A statement on the school website informs parents and carers about our commitment, duties and responsibilities under child protection and safeguarding procedures. Parents can obtain a copy of this Safeguarding and Child Protection Policy and other related policies on request or via the individual school websites

Child Protection Procedures

Recognition and categories of abuse and neglect

Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child

All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2022. This is outlined locally within the [Kent Support Levels Guidance](#).

All staff at all BA-MAT schools recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:

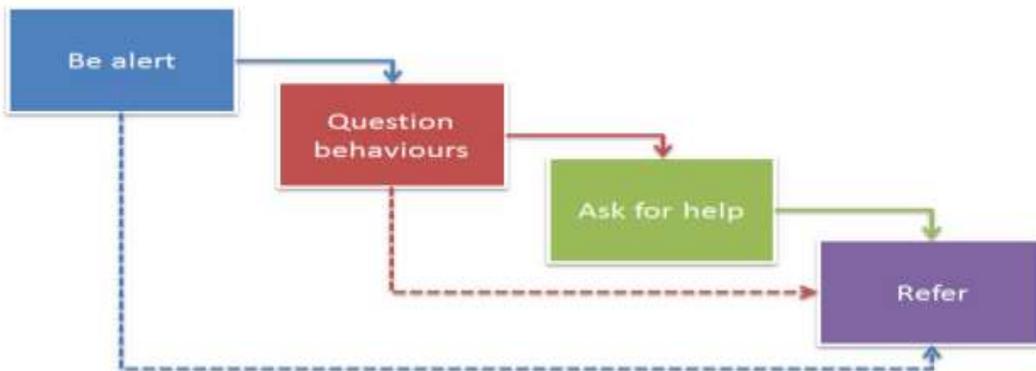
- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The most up to date definitions and possible indicators and signs of abuse are found in **Appendix 1 on page 58.**

Staff should also refer to Part 1 and Annex A within “Keeping Children Safe in Education” 2022 and “What to do if you are worried a child is being abused” 2015. A copy of each of these are in STRAT offices at each school with the safeguarding polices as well as on SHAREPOINT and CPOMS/My Concern library for staff to access electronically.

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



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

Each school recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

The Schools recognise abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

Safeguarding incidents and/or behaviours can be associated with factors and risks outside the schools. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online from people they know (including other children) and from people they do not know, in many cases, abuse with take place concurrently via online channels and in daily life.

The Schools recognise that some children have additional or complex needs and may require access to intensive or specialist services to support them. This is particularly the case at Aspire since all pupils have an EHCP for specialist provision which makes them much more vulnerable to safeguarding concerns.

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

In all cases, if staff are unsure, they will always speak to the DSL (or deputy).

If deemed necessary by the CEO or Lead DSL or by staff authorised by the CEO or Lead DSL, following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

- The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
- Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

Responding to Child Protection Concerns

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

- Listen carefully to the child, reflecting the concern
- Be non-judgmental.
- Avoid leading questions; only prompting the child when necessary with open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
- Not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- Be clear about boundaries and how the report will be progressed.
- Record the concern on CPOMs our recording system
- Inform the DSL (or deputy), as soon as practically possible.

If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 1). In these circumstances, any action taken will be shared with a DSL as soon as is possible.

All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

All school will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk

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

Where it is identified a child may benefit from Early Help support (as provided by [ICS](#)), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.

- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the [Education Safeguarding Service](#) if the situation does not appear to be improving or is getting worse.

All staff are made aware of the process for making referrals to Integrated Children’s Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments [Appendix 5 page 67](#)

Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a ‘request for support’ will be made immediately to Kent [Integrated Children’s Services](#) (via the ‘Front Door’) and/or the police, in line with KSCMP procedures.

- Each school recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is **NOT** to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
- The DSL may seek advice or guidance from an Area Education Safeguarding Advisor from the [Education Safeguarding Service](#) before deciding next steps.
- They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children’s Services](#) (ICS).

In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, **unless** there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.

If, after a request for support or any other planned external intervention, a child’s situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child’s situation improves. DSLs may request support with this via the [Education Safeguarding Service](#).

All BA-MAT schools are [Operation Encompass Schools](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

Recording Concerns

A guide to CPOMS and My Concern categories and processes can be found in [Appendix 4 page 65/66](#)

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on CPOMS/My Concern online safeguarding system and with an ALERT to the DSL without delay. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.
- Staff, who work after school hours and have no access to laptops, will log any concerns on the green forms in the office. These should then be posted under the locked door of the Senior Leaders office so they can be acted on when the DSL arrives the next day.
- All concerns are recorded and kept on CPOMS/My Concern. When a paper child protection file from a previous setting arrives, these are uploaded to the online system.
- Records will be completed as soon as possible after the incident/event, using the child's words, " " and the system will name, date and time stamped the record.
- Child protection records will record facts and not personal opinions.
- A body map will be completed if injuries have been observed
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority, it will also be marked as **HIGH PRIORITY** on CPOMS/My Concern
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL All members of staff have the information in [Appendix 4 page 65/66](#) to support them
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will be kept confidential and stored securely online. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school.
- Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- Where staff have concerns such as a parent is repeatedly failing to take their child to medical appointments, have a repeatedly missing medication i.e. asthma pumps, or continuing to not treat ailments i.e. lice, these should be recorded on CPOMS/My Concern
- *Bobbing/Iwade: Where a child receives early intervention, such as counselling, this is recorded on the RAP for the class held on SHAREPOINT*
- All Staff WILL familiarise themselves with the responsibilities as outlined in this document.

Pupil Change of Educational Setting

- All child protection records will be transferred via CPOMS/My Concern or a document download and emailed securely in accordance with data protection legislation to the child's subsequent school. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained. File will be shared within 5 days for an in-year transfer or within the first 5 days of the start of a new term
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files, the DSL will ensure key staff, will be made aware of relevant information as required.

- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

Multi-agency working

All schools in BA-MAT recognise the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements.

The Schools' leadership team, Trustees and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.

Each of the schools recognise the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

The Schools will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

The CEO and Heads of School/HeadTeacher and DSLs are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our 'Searching, Screening and Confiscation' policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance

Confidentiality and record sharing

The Trust recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2022.

The Trust has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our Trust is compliant with all matters relating to confidentiality and information sharing requirements dpo@ba-mat.org.uk

Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2022). KCSIE 2022, the [Information Commissioner's Office](#) (ICO) and the DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) guidance provides further details regarding information sharing principles and expectations.

The Head of School/HeadTeacher and DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy for the Trust, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

Further advice on responding to disclosures can be found in [Appendix 2 on page 61](#)

Sharing with wider agencies

Where a wider agency – such as Social Services or Early Help – request information about a child:

- Where a request is made by the phone, the contact details will be taken and the DSL will call the agency back. This is to confirm that this is an authorised agency request on a known phone number.
- If the Early Help or Social worker is known to the DSL (where a longer case is being actioned), this step can be missed after the identity has been initially confirmed
- Any requests for information will be logged on CPOMS, who the information was shared with, what information was shared and the decisions why that was shared. This supports GDPR and data protection
- Any information shared as a report, or by email will also be recorded by copying/uploading onto CPOMS/My Concern

Safeguarding records being shared with new schools

When a child from the Trust moves to a new school, at any time during the school year, the following steps will be taken to transfer the safeguarding records: WITHIN 5 SCHOOL DAYS

- Contact will be made with the new school by the school Office to check whether a CPOMS/My Concern electronic transfer can be made... If they do then:
 - The CPOMS/My Concern record will be transferred at the same time as the CTF file by a school DSL.
 - An email will be sent to the school at the same time so that the new school can sign and return to show that the records have been successfully received
 - If the receipt email is not received, the DSL who sent the record will continue to follow this up to ensure this is received
 - The DSL who prepared and sent the report will then log on CPOMS/My Concern that the records have been successfully transferred and attach the receipt. Where a record has been archived on CPOMS/My Concern, this step will still be taken
- If the receiving school do not have CPOMS/My Concern:
 - The DSL will prepare the printed report and store this securely where needed
 - The receipt email will be requested
 - The records will be sent via an encrypted email/password protected
 - The receipt will be added to the pupil record on CPOMS/My Concern
- The exception for signed receipts being added to individual pupil records is where a batch of records are taken (such as in year 6 transition to secondary school). These receipts for bulk records will be saved in the safeguarding folder which is locked in a cupboard.
- DSLs will consider whether a face to face meeting would be advantageous in more complex cases so that the case can be discussed and the records handed over

Sharing Social Services reports with parents

Where a report is prepared for a case under Child Protection, the prepared report will be either printed, then collected and signed for by the parents, or sent by encrypted email or password protected.

Complaints

All members of each school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on our Trust website and on SharePoint in the policies section.

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

Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

The Team and DSLs take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Allegations of abuse against Staff** policy (staff policies held on SHAREPOINT) with **pages 52** of this policy.

Specific Safeguarding Issues

Each school is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2022 which contains important additional information about specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in this policy and speak with the DSL or a deputy.

Child on Child Abuse

All members of staff at each School recognises that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer on peer' abuse), and that it can happen both inside and outside of school/college and online.

The trust recognises that Child on Child abuse can take many forms, including but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between children
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2022

Each school adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

The Schools recognise that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.

All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

In order to minimise the risk of child-on-child abuse, each school will:

- Challenge direct/indirect comments, behaviours and actions
- Educate our pupils using the RSE Curriculum, Discovery (main stream schools) and Computing curriculum to enable them to stay safe, aware of their roles and responsibilities to themselves and each other.
- Enhance our curriculum with local and national initiatives to educate our pupils i.e. Clever Never Goes, NSPCC Speak Out! Stay Safe! Pantasaurus
- Talk Time boxes are located in all communities, allowing opportunities for pupils to request 1:1 time with trained counsellors (main stream schools)
- Each community has a Community Lead with a responsibility for pastoral support (mainstream schools)
- Child friendly information posters located around the school
- Bobbing & Iwade schools: [Positive behaviour principles handbook](#) - incorporating Behaviour, Exclusions, Positive Handling, Anti-Bullying & Racist Incidents Policies
- Aspire School: [Positive Behaviour Policy](#) – incorporating Team Teach principles, behaviour and inclusions

Each school wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of Child on Child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated schools policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Concerns about learner's behaviour, including Child on Child abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies. *Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory*

power to discipline pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.

We understand that a revised process may be required for managing any report of such abuse and supporting victims. If we receive a report of Child on Child abuse, we will follow the principles set out in Part 5 of KCSIE and those outlined in the safeguarding and child protection policy. The Trust will listen to and work with the pupil, parents/carers and any multi-agency partner needed to ensure the safety and security of that child. This may be conducted via virtual meetings where necessary. All concerns will be recorded on CPOMS and appropriate referrals made.

Alleged victims, perpetrators and any other child affected by Child on Child abuse will be supported by the School.

All our schools take the report of Child on Child abuse very seriously and will listen carefully to all those involved while avoiding victim blaming. Each case will be treated sensitively and the support given may vary but could include:

- Pastoral Support
- Working with parents
- Wellbeing Lead Support
- School Counselling
- Edify Counselling
- Direct education and/or reviewing, adapting and develop our educational approaches.
- Working with other agencies
- Writing a Risk Assessment (where all children at Aspire already have a Risk Assessment in place, this may be accompanied by a Behaviour Support Plan)

The child who is perpetrating the abuse may also be at risk of harm and so must also be treated as a victim and an assessment of the risk and their needs undertaken

Furthermore, the schools will follow procedures as identifies in our Safeguarding and Child Protection Policy and Positive Behaviour Principles/behaviour policies and where necessary and appropriate inform the police and/or Integrated Children's Services.

Child on Child Sexual Violence or Harassment

When responding to concerns relating to child-on-child sexual violence or harassment, all schools will follow the guidance outlined in **Part five of KCSIE 2022**

Each of our schools recognises sexual violence and sexual harassment can happen anywhere, and all staff will maintain an attitude of 'it could happen here'. We recognise sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is **never** acceptable.

All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.

Abuse that occurs online or outside of the schools will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, including positive behaviour principle policy and child protection policy.

All schools recognise that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.

Each school recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.

- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and relevant local/national guidance and support, for example [KSCMP](#) procedures and support from the [Education Safeguarding Service](#).
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them.
- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:

- The wishes of the victim in terms of how they want to proceed.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children.
- If the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Understanding intra familial harms and any necessary support for siblings following incidents.
- Whether there are any ongoing risks to the victim, other children, adult students, or school staff.
- Any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Each school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

The Trust recognises that some groups may be vulnerable to sexual violence or harassment which includes girls, those with SEND, those who are LGBTQ+ or perceived to be by their peers. The RSE curriculum (main stream schools) gives focus to positive relationships, as well as discussing sexuality and gender. The RSE curriculum at Aspire also gives focus to positive relationships, gender and sexuality at a developmentally-appropriate level for each child. Any incident of sexual violence and/or harassment must be reporting on CPOMS/My Concern so it can be investigated appropriately.

As with all safeguarding concerns the incident, actions and reviews will be held on CPOMS/My Concern.

If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

Nude and/or Semi-Nude Image Sharing by Children

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

The UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups.

All schools recognise that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be recorded on CPOMS/My Concern and reported to and dealt with by the DSL (or deputy).

When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to the DSL immediately.
- **Never view, copy, print, share, forward store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.**
- Not delete the imagery or ask the child to delete it.
- Avoid saying or doing anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Do not promise confidentiality, as other agencies may need to be informed and be involved.
- Do not investigate or ask the child or children involved in the incident to disclose information regarding the imagery
- Do not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

DSLs will respond to concerns in line with the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#) and the local KSCMP guidance.

When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.

- Parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- A referral will be made to Integrated Children’s Services and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child’s developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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

All schools in BA-MAT recognise that both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into **any** sexual or criminal activity -

- in exchange for something the victim needs or wants, **and/or**
- in exchange for the financial advantage **and/or**
- in exchange for increased status of the perpetrator or facilitator **and/or**
- through violence or the threat of violence

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim may have been exploited even if the activity appears consensual. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

All our schools recognise that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

Each of the school recognises that CSE can occur over time or be a one-off occurrence and may happen without the child’s immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

CCE and CSE does not always involve physical contact; it can also occur through the use of technology.

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

Dark web sites using anonymity software to encrypt web traffic and deep web databases and web services, which cannot be indexed by conventional search engines, elevates internet risk as it enables people to keep their activities hidden. Whilst there are legitimate uses for the dark web e.g. providing internet anonymity for people living in countries where they can be arrested or tortured for online activity, it also enables on-line criminal activity.

CCE

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (**county lines**), forced to shoplift or pickpocket, or to threaten other young people.

Recent evidence shows an increase in children being targeted to act as money mules by fraudsters who wish to hide money from the authorities. Targeted through adverts on social media, video sharing sites and in some cases outside schools, children are offered money in exchange for moving the fraudsters money through their bank accounts. Most children are unaware that allowing their bank account to be used in this way is unlawful and carries a maximum sentence of 14 years in prison.

CSE

All BA-MAT schools identify that CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

The prevalence and availability of technology provides a further medium where abusers can exploit children. Recent statistics show that the age of online service users is getting younger, which places more children at risk of CSE abuse. This access to technology, social networking sites and mobile devices offers the abuser further mediums to groom, coerce, blackmail and exert control.

Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexting, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.

CCE and CSE

In CSE and CCE, the term grooming describes the process abusers use to manipulate a child. This includes physical and mental manipulation in order for the perpetrator to take advantage of the child. Such perpetrators are often patient and develop the grooming process over a long period of time to achieve their aim.

Typical grooming tactics are:

- Making the child feel special;
- Pretending to feel like or have similar experiences of the child;
- Careful construction of the relationship to get to know all about the child;
- Pretending the relationship is friendship or support, non-sexual;
- Giving the child things they need or want;
- A gradual increasing physical contact or pressuring for exploitative activity;
- Construction of the need for secrecy;

- Using other children or young people to help groom.

As with other forms of child abuse there are no definitive indicators that will make a child susceptible to CSE and CCE but the following should be considered:

- Chaotic dysfunctional home life;
- Poor or problematic parenting, including parental mental health issues;
- A history of abuse or neglect;
- Domestic violence in the home;
- Bereavement;
- Low self-esteem or self-worth;
- SEND;
- Uncertainty of sexual orientation;
- Association with children who are or have been sexually exploited;
- Homelessness or living in residential care;
- Where the child is a young carer;
- Gang association.

Indicators that a child may be already exposed to CSE and CCE may include:

- Absence from education;
- Reduced contact with friends and or family;
- Frequently going missing from home or care;
- Association with gangs;
- Self-harming;
- Poor mental health;
- Physical injury;
- Sexually transmitted infections;
- Pregnancy and terminations;
- Substance misuse;
- Suicidal thoughts or attempts;
- Having unexplained items or possessions;
- Sexual activity with someone of an older age;
- Inappropriate relationships on social media;
- Encouraging others into exploitative relationships / situations

Links for further support:

- <https://www.barnardos.org.uk/what-we-do/protecting-children/cse>
- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>
- <https://safeandsoundgroup.org.uk/help-support/parentscarers/> offers support for parents

Every member of staff at each of our schools recognises that children at risk of CCE and CSE need to be identified and issues relating to CCE and CSE should be approached in the same way as protecting children from other risks. Some of the following can be indicators:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education.

- Children with multiple phones

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy and record concerns on CPOMs/My Concern

Serious Violence

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

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

Involvement in serious violence, particularly knife crime is a growing safeguarding issue. Possible indicators and vulnerability factors include:

- Troublesome / high daring behaviour;
- A change in friendships / relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self harm;
- Significant changes in wellbeing;
- Unexplained injuries / non plausible explanations of injuries;
- Unexplained gifts / new possessions;
- Gang involvement;
- Involvement in anti-social behaviour;
- A disrupted / dysfunctional family;
- Poor family supervision;
- Children with learning disabilities;
- Peer involvement in anti-social behaviour / crime

The curriculum at our mainstream schools includes Relationships and PSHE teaching to focus on developing skills and knowledge on how to resolve conflict. This is delivered in an appropriate way to children at Aspire school with regard to their stage of development and cognition.

The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

County Lines and Gangs

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money.

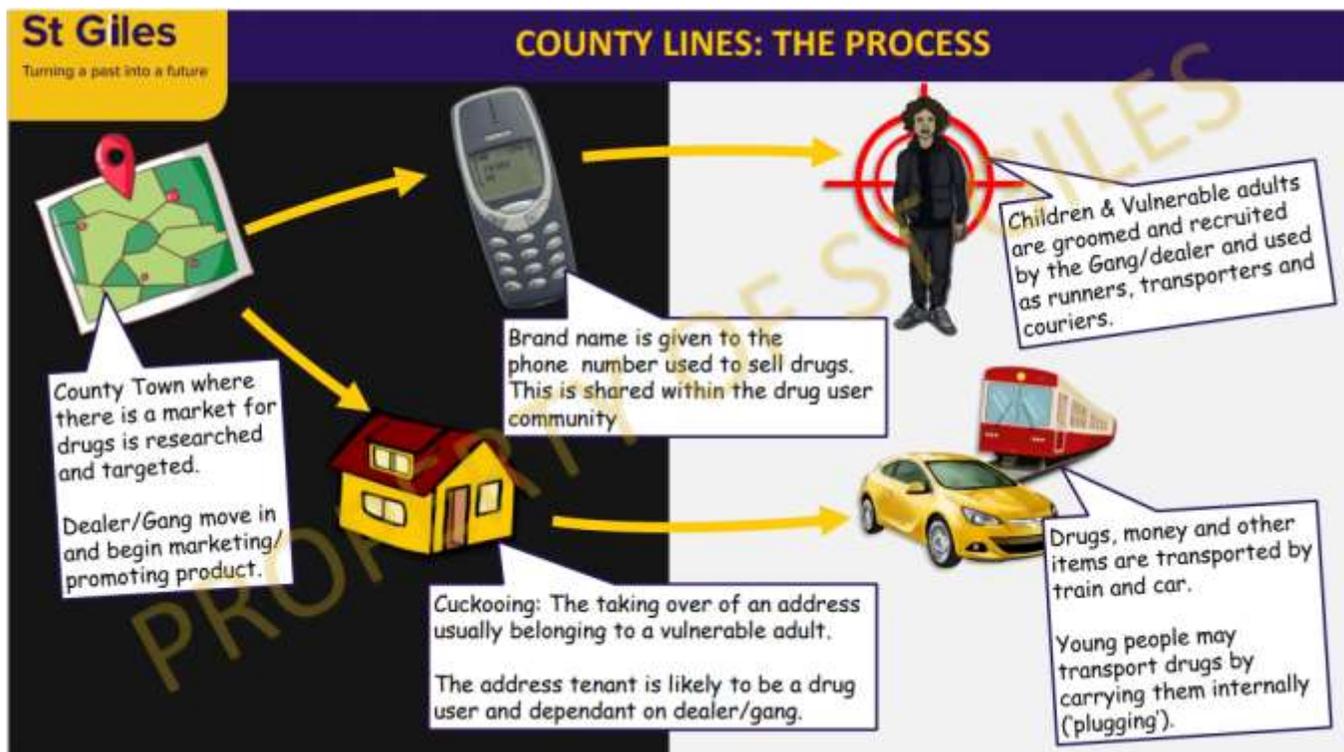
Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

County Lines is referred to colloquially as country, cunch, OT, out there, out of town, upsuh and going O, plus many other terms.

Drug operations/phone lines are set up in regional areas by organised crime groups, most commonly originating from major cities. Young children are exploited as couriers, runners and dealers.

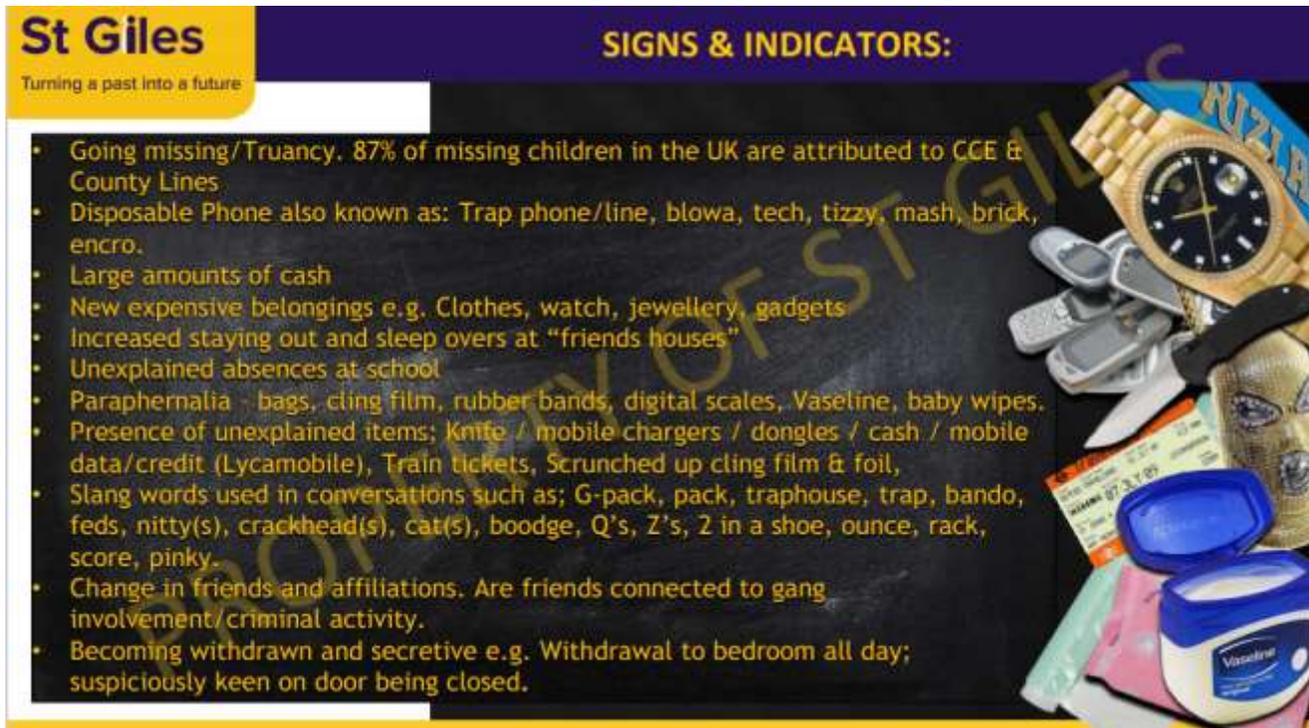




And the factors which can make a child vulnerable:



And signs and indicators:

A poster titled 'St Giles' with the tagline 'Turning a past into a future'. The main heading is 'SIGNS & INDICATORS:'. The poster features a list of signs and indicators on a dark background, with various items like a watch, a knife, a mobile phone, and a jar of Vaseline on the right side. The text is in yellow and white.

St Giles
Turning a past into a future

SIGNS & INDICATORS:

- Going missing/Truancy. 87% of missing children in the UK are attributed to CCE & County Lines
- Disposable Phone also known as: Trap phone/line, blowa, tech, tizzy, mash, brick, encro.
- Large amounts of cash
- New expensive belongings e.g. Clothes, watch, jewellery, gadgets
- Increased staying out and sleep overs at "friends houses"
- Unexplained absences at school
- Paraphernalia - bags, cling film, rubber bands, digital scales, Vaseline, baby wipes.
- Presence of unexplained items; Knife / mobile chargers / dongles / cash / mobile data/credit (Lycamobile), Train tickets, Scrunched up cling film & foil,
- Slang words used in conversations such as; G-pack, pack, traphouse, trap, bando, feds, nitty(s), crackhead(s), cat(s), boodge, Q's, Z's, 2 in a shoe, ounce, rack, score, pinky.
- Change in friends and affiliations. Are friends connected to gang involvement/criminal activity.
- Becoming withdrawn and secretive e.g. Withdrawal to bedroom all day; suspiciously keen on door being closed.

The Trust recognises the impact of gangs, county lines, serious violence, crime and exploitation. Any concerns regarding gangs and county lines will be reported and responded to in line with other child protection concerns.

The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

[Preventative Schools Work - St Giles \(stgilestrust.org.uk\)](http://stgilestrust.org.uk)

So Called 'Honour' based abuse

Members of staff at Bobbing, Iwade, Aspire & Grove Park schools are aware that so called 'Honour-based' abuse (HBA) encompasses incidents or a range of crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, abduction, murder and practices such as breast ironing.

All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.

The indicators of HBA and associated factors will be covered with staff within the school safeguarding training. All members of staff are alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

HBA can take many forms and victims may experience:

- Direct threats and controlling behaviour;
- Threatening phone calls, emails or texts;
- Abuse via social media;

- Emotional cruelty/ psychological abuse;
- Domestic abuse;
- Imprisonment;
- Abduction/kidnap;
- Forced repatriation;
- Sexual abuse which may include rape;
- Forced abortion;
- Forced pregnancy;
- Assault;
- Murder

Staff should report concerns around HBA within the staffing team, parents, visitors or volunteers to the DSL team to report their concerns under adult safeguarding procedures.

DSLs can also contact the Honour helpline 0800 599 9247 for advice.

Links for further support:

- <https://karmanirvana.org.uk/> (also forced marriage)
- <https://www.haloproject.org.uk/> (also for forced marriage)

Breast ironing

Form of physical abuse – pounding of breasts using hard or heated objects to make them stop developing or disappear. Usually carried out by elder female family members on girls aged 9-15 – the practice is performed to make them appear child-like for longer with the rationale that this will protect them from sexual harassment, rape, pregnancy and forced marriage. This can lead to infection, abscesses, chest pain, breast malformation and future breastfeeding difficulties. It is practiced in African countries and is particularly prevalent in Cameroon.

Indicators include:

- Chest pain or discomfort;
- Changes in behaviour;
- Withdrawal;
- Reluctance to undress in front of others

Female Genital Mutilation (FGM) mandatory reporting duty

Whilst all staff will speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Reporting should be carried out by calling 101.

The DSL will complete the FGM e-Learning package (<https://www.fgmelearning.co.uk/>). The DSL will also ensure that information and training is made available as appropriate to all members of staff. This includes:

- “FGM The Facts”: www.gov.uk/government/uploads/system/uploads/attachment_data/file/482799/6_1587_HO_MT_Updates_to_the_FGM_The_Facts_WEB.pdf
- “FGM an Overview:” <http://www.local.gov.uk/sites/default/files/documents/what-fgm-2dd.pdf>

Links for further support:

- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm/>
- <https://www.england.nhs.uk/wp-content/uploads/2016/12/fgm-pocket-guide-v5-final.pdf> leaflet of information for staff giving signs to look for
- <https://www.childline.org.uk/info-advice/bullying-abuse-safety/abuse-safety/female-circumcision-fgm-cutting/> to support children
- <https://www.barnardos.org.uk/what-we-do/protecting-children/fgm>

Summary of the FGM mandatory reporting duty

Traditional and local terms for FGM

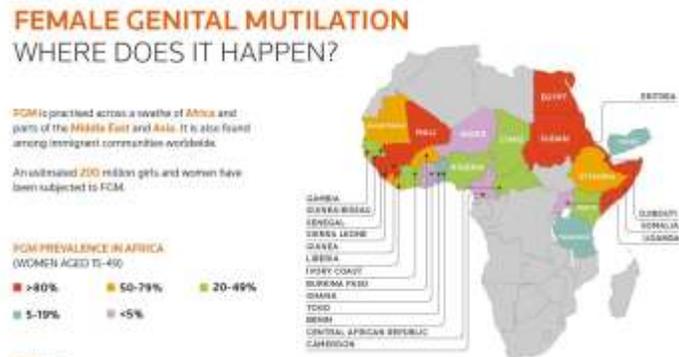
From the Home Office training, local terms for FGM are:

Traditional and local terms for FGM			
Country	Term used for FGM	Language	Meaning
EGYPT	Thara	Arabic	Deriving from the Arabic word 'thara' meaning to clean/purify
	Khitan	Arabic	Circumcision - used for both FGM and male circumcision
	Khifad	Arabic	Deriving from the Arabic word 'khafad' meaning to lower (rarely used in everyday language)
ETHIOPIA	Megrez	Amburic	Circumcision/cutting
	Absum	Harrari	Name giving ritual
ERITREA	Mekhnishab	Tigreña	Circumcision/cutting
KENYA	Kutari	Swahili	Circumcision - used for both FGM and male circumcision
	Kutari was ikhama	Swahili	Circumcision of girls
NIGERIA	Ibi / Ugwu	Igbo	The act of cutting - used for both FGM and male circumcision
	Sunna	Mandingo	Religious tradition/obligation - for Muslims
SIERRA LEONE	Sunna	Sonaso	Religious tradition/obligation - for Muslims
	Hondo	Temene	Integral part of an initiation rite into adulthood - for non Muslims
	Bondo / Sende	Mende	Integral part of an initiation rite into adulthood - for non Muslims
	Hondo	Mandingo	Integral part of an initiation rite into adulthood - for non Muslims
	Bondo	Limba	Integral part of an initiation rite into adulthood - for non Muslims

SOMALIA	Godiin	Somali	Circumcision used for both FGM and male circumcision
	Halalays	Somali	Deriving from the Arabic word 'hala' ie. 'sanctioned' - implies purity. Used by Northern & Arabic speaking Somalis.
	Qodin	Somali	Stitching /tightening/sewing refers to infibulation
SUDAN	Khifad	Arabic	Deriving from the Arabic word 'khafad' meaning to lower (rarely used in everyday language)
	Tahoor	Arabic	Deriving from the Arabic word 'thara' meaning to purify
CHAD - the Ngama Sara subgroup	Bagne		Used by the Sara Madjngaye
	Gadja		adapted from 'ganza' used in the Central African Republic
GUINEA-BISSAU	Fanadu di Mindjer	Kriolu	'Circumcision of girls'
	Fanadu di Omi	Kriolu	'Circumcision of boys'
GAMBIA	Niaka	Mandinka	Literally to 'cut/wood clean'
	Kuyango	Mandinka	Meaning 'the affair' but also the name for the shed built for initiates
	Musotula Karoola	Mandinka	Meaning 'the women's side'/'that which concerns women'

Source: <http://www.forwarduk.org.uk/key-issues/fgm/definitions>

International prevalence



Although FGM takes place between birth and around 15 years old; it is believed that the majority of cases happen between the ages of 5 and 8.

Since FGM can be carried out at any age, from new-born onwards, it is vital to be alert for any sign of potential FGM risk factors or signs.

A DSL will speak to a family member about any leave of absence request which is to a country where FGM is practised. There will be a consultation with Kent Education Safeguarding too, and this is part of our Statutory Duty in safeguarding.

The Consultation and the conversation with parent will then be recorded on CPOMS.

Risk factors include

- Level of integration into UK society
- Familial history – especially sister
- Girls withdrawn from RSE may be at risk

Warning signs for FGM about to take place

- Older visitor from country of origin
- Girls of school age taken abroad at the start of the summer holidays – be alert to talk about a long holiday abroad – or parents tell you they are removing their children from the country for a prolonged period
- Girl discloses she is to have a ‘special procedure’ or ‘attend special occasion to become a woman’

Indications that FGM has taken place

- Difficulty walking, sitting or standing
- Spending longer in the toilet
- Lengthy absence from class with bladder or menstrual problems
- Frequent urinary or menstrual problems
- Prolonged or repeated absence from school
- Noticeable behaviour changes
- Particular reluctant to undergo medical examinations
- Asking for help but vague about the problem (embarrassment or fear)

Asking difficult questions

When talking about FGM, professional should:

- Ensure that a female professional is available to speak to, if the girl or woman would prefer this;
- Make no assumptions;
- Give the individual time to talk and be willing to listen;
- Create an opportunity for the individual to disclose, seeing the individual on their own in private;
- Be sensitive to the intimate nature of the subject;
- Be sensitive to the fact that the individual may be loyal to their parents;
- Be non-judgemental (point out the illegality and health risks, but not blaming the girl or woman);
- Get accurate information about the urgency of the situation if the individual is at risk of being subjected to the procedure;
- Take detailed notes;
- Use simple language and ask straightforward questions;
- Use terminology that the individual will understand, e.g. the individual is unlikely to view the procedure as 'abusive';
- Avoid loaded or offensive terminology such as 'barbaric';
- Use value-neutral terms understandable to the woman, such as: "Have you been closed?", "Were you circumcised?", "Have you been cut down there?";
- Be direct; indirect questions can confuse and may only cause embarrassment or discomfort to you or the patient;
- If confusion remains, ask leading questions such as: "Do you experience any pains or difficulties during intercourse?", "Do you have any problems passing urine?", "How long does it take to pass urine?", "Do you have any pelvic pain or menstrual difficulties?", "Have you had any difficulties in childbirth?";
- Give the message that the individual can come back to you if they wish; and
- Give a clear explanation that FGM is illegal and that the law can be used to help the family avoid FGM if/when they have daughters.

Call the FGM Helpline 0800 028 3550 to discuss any concerns, unless you are a member of teaching staff and know the girl has undergone FGM then you MUST refer the case directly to the Police.

Staff are aware that family members should not be used as interpreters and that familial links are identified. The curriculum is used to promote body safety for all children and FGM is taught as part of our RSE curriculum.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage

Forced marriage is not specific to one country or culture. Victims include people thought to be at potential risk of future forced marriage, those currently going through a forced marriage and those who have already been forced to marry. Women, men and children are at risk of forced marriage regardless of age or background. Research

shows there is no predisposed group at risk of forced marriage, however often lesbian, gay, transsexual or transgender people may be forced into marriage as a means seen to protect family honour. Also persons with a physical or learning disability are at risk by being forced into a marriage in order to provide them with a carer. Some of the key motives for facilitating a forced marriage are:

- Controlling unwanted sexuality, including perceived promiscuity and sexual behaviour of women;
- Controlling unwanted behaviour e.g. alcohol/drug use, wearing make-up, behaving in what is perceived as a westernised manner;
- Preventing unsuitable relationships e.g. outside the ethnic, cultural or caste group;
- Protecting family honour (also known as izzat);
- Responding to peer group or family pressure;
- Attempting to strengthen family links;
- Achieving financial gain;
- Ensuring land, property and wealth remain within the family;
- Protecting perceived cultural ideals; Protecting religious ideals which are misguided;
- Ensuring care for a child or adult with SEND where parents/carers are unable to fulfil that role;
- Assisting claims for UK residence and citizenship;
- Long standing family commitments.

Staff are also aware that families where forced marriage has occurred are at greater risk of planning a forced marriage for their children.

The mainstream schools use PSHE and Relationships education to teach the fundamental building blocks and characteristics of positive relationships. See [Relationships education \(Primary\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk) In Aspire school, this is delivered in a stage of development appropriate way.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. *Staff should report concerns regarding forced marriage to the DSL* or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fco.gov.uk

Links for further support:

- <https://www.childline.org.uk/info-advice/bullying-abuse-safety/crime-law/forced-marriage/>

Preventing Radicalisation

All schools are aware of their duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies. [Protecting children from radicalisation: the prevent duty - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Each of our schools recognise that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help and protection.

Extremist views can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for exploitation.

The Trust, educates, challenges and protects children from harm of radicalisation as part of our wider safeguarding duties.

Each school will ensure all members of staff complete an approved training package which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process. The referral form can be found on SHAREPOINT and is called **Prevent National Referral form**.

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

Training

- Home Office training on Prevent <https://www.elearning.prevent.homeoffice.gov.uk/>.
- Home Office training on making a referral into Channel https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html

The DSL will attend additional training which includes further information on the Prevent Duty. Kent have a dedicated Prevent Officer who can be contacted for support sally.green2@kent.gov.uk More document links are on <https://www.kelsi.org.uk/child-protection-and-safeguarding/prevent-within-schools>

Every member of staff at each of our schools recognise that children exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting children from other risks.

Radicalisation is a gradual process and has a range of factors which may contribute to making someone vulnerable. These are:

- Peer pressure;
- Influence from other people;
- The Internet;
- Bullying;
- Crime;
- Anti-social behaviour;
- Family tension;
- Lack of self-esteem;
- Personal political grievances.

The curriculum we deliver plays a role in building resilience to radicalisation by promoting positive values – in particular, the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The formal curriculum can be used to support positive messaging and counter-narratives, for example in PSHE, history, citizenship and RE. This allows pupils to be supported to explore through debate and discussion these issues in a safe environment. Staff engaging in these discussions will have been trained in Prevent duty and be coached in leading and managing such discussions.

The majority of children in our schools are White British children so may be vulnerable to extreme right wing groups (who would target our minority ethnic community) or Islamic extremism (which would target our minority of Muslim children and families). The RE curriculum teaches children about Islam as well as other religious beliefs and encourages children to discuss their beliefs and to be tolerant of all beliefs.

Additional information about responding to radicalisation and extremism online can be found in the schools **Online Safety Policy**. More information can also be found on www.educateagainsthate.com or <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Homelessness

At our schools, we recognise that homelessness presents a real risk to a child's welfare. The DSL team are aware of using Porchlight <https://www.porchlight.org.uk/commissioners-and-professionals/our-services/housing-and-homelessness-services> and Kent guidance on <https://www.kent.gov.uk/social-care-and-health/care-and-support/housing-and-care-homes/homeless> to support homeless families and access Kent Homeless Connect to make a referral. The DSL team are aware that even where a referral is proceeding, this does not replace a referral through the digital front door where a child has been harmed or is at risk of harm. The FLO acts to support families struggling with risk of, or homelessness. Where possible, the Trust uses funding to support the family in matters such as travel so children can continue to attend school.

Links to provide support:

- https://england.shelter.org.uk/_data/assets/pdf_file/0007/269512/GP_Briefing_Supporting_homeless_children_Children_and_family_services.pdf
- <https://www.barnardos.org.uk/what-we-do/supporting-young-people/homelessness>
- <https://www.homeless.org.uk/sites/default/files/site-attachments/HomelessFamiliesLearningResource%20FINAL.pdf> support resource for staff

Family members in Prison

Children who have a family member in prison are at risk from poor outcomes including poverty, stigma, isolation and poor mental health. Where we are made aware, the FLO provides support the family, as well as the DSL team being made aware. This is logged on CPOMS/My Concern as a safeguarding concern so it can only be seen by the DSL team as we recognise there is stigma for the family associated with this.

Links to provide support:

- <https://www.nicco.org.uk/>
- <https://www.barnardos.org.uk/what-we-do/helping-families/children-with-a-parent-in-prison>
- <https://www.prisonadvice.org.uk/pages/faqs/category/tell-my-child>
- <https://www.familiesoutside.org.uk/content/uploads/2017/12/Families-Outside-Schools-Booklet-for-Teachers.pdf> - booklet for teachers on supporting prisoners' families

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first statutory definition of domestic abuse.

At our schools we recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn. We recognise that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

The definition captures a range of different abusive behaviours, including but not limited to :

- Physical
- Emotional
- Financial
- Coercive and controlling behaviour
- Psychological
- Sexual

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Our Schools are [Operation Encompass Schools](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse, which are logged on CPOMS so that follow-up actions can be taken.

If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

We use guidance from:

- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>
- <https://www.refuge.org.uk/>
- <https://mensadviceline.org.uk/> for male victims of domestic abuse
- <http://www.galop.org.uk/> for LGBT+
- <https://www.womensaid.org.uk/cover-your-tracks-online/> to remove evidence of visiting domestic abuse websites
- Hestia app or Bright Sky app which provide support and information
- <https://chayn.co/> for multi-language support
- <https://www.imkaan.org.uk/> for black and minority group abuse
- <https://southallblacksisters.org.uk/> for support for Asian and Afro-Caribbean women
- <http://staysafe-east.org.uk/> supporting deaf and disabled people dealing with crime, domestic and sexual abuse
- <https://signhealth.org.uk/> supporting deaf people
- <https://safelives.org.uk/>
- <https://respectphonenumber.org.uk/> offering advice to those who are perpetrators

The FLOs (and SENCo/DSLs) act supportively to help families who are victims of domestic abuse – through phone calls, face to face meetings and helping with referrals into agencies to get support. The Trust respects where adults feel unable to give the school their home address where this is a refuge. Sometimes address will be shared in person and not held on Arbor. These addresses will be held in the Safeguarding folder in a locked cupboard which has restricted access.

Mental Health

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

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

The mainstream schools also offer time with Edify, a trained counsellor who is onsite each week.

Cybercrime

The schools within BA-MAT, recognise that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

[Cyber Choices: Helping you choose the right and legal path - National Crime Agency](#)

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

Parents and Parental Responsibility

Everyone who is a parent has a right to participate in decisions about a child's education but we recognise that at times this can lead to difficulties between separated parents, which in some cases can lead to safeguarding and welfare concerns for the child/ren involved. Making child arrangements via the family courts following separation is stressful for the families and has an impact on the children.

We are aware that parents may be recognised differently under education law, than under family law. Section 576 of the Education Act 1996 states that a 'parent', in relation to a child or young person, includes any person who is not a parent (from which can be inferred 'biological parent') but who has parental responsibility, or who has care of the child.

For the purposes of education law, the Government considers a 'parent' to include:

- all biological parents, whether they are married or not

- any person who, although not a biological parent, has parental responsibility for a child or young person - this could be an adoptive parent, a step-parent, guardian or other relative
- any person who, although not a biological parent and does not have parental responsibility, has care of a child or young person
- A person typically has care of a child or young person if they are the person with whom the child lives, either full or part time and who looks after the child, irrespective of what their biological or legal relationship is with the child.

In cases where a person is not the biological parent of a child, does not have 'parental responsibility' for that child and that child no longer lives with them, it's unlikely that they will be recognised as a 'parent'. Any disputes about whether a person is a child's 'parent' within the meaning of section 576 Education Act 1996, are for the courts to decide.

A child's birth mother (the person who carried the child) has parental responsibility unless it's removed by an adoption order or a parental order following surrogacy. Where a child's father and mother were married to each other at the time of the child's birth, they each have parental responsibility for the child. Where the parents were not married to each other at that time, the child's father can gain parental responsibility:

- by registering the child's birth jointly with the mother
- by subsequently marrying the child's mother
- through a 'parental responsibility agreement' between him and the child's mother which is registered with the court
- by obtaining a court order for parental responsibility

Where two female parents have a child through fertility treatment, the mother's female partner is treated in the same way as a father. She has parental responsibility if she is married to or in a civil partnership with the mother at the time of the treatment (or if the two women agree in writing that she will be the child's second parent). She can also acquire parental responsibility in the same way that a child's father can.

People who are not the child's biological mother, father or second female parent can also acquire parental responsibility.

Civil partners have parallel rights to married people in terms of parental responsibility. The same provisions for married people apply to them in terms of:

- acquiring parental responsibility - adoption, agreement with their civil partner or by an order from the court
- holding parental responsibility

Key effects of a father or second female parent acquiring parental responsibility

When a father or second female parent acquires parental responsibility they:

- can give valid consent for his child's medical treatment (subject to the competency of the child to give their own consent or object to the treatment being proposed)
- has a right of access to his child's health records

- can withdraw a child from sex education and religious education classes and make representations to schools concerning the child's education
- has sufficient rights in relation to a child to invoke the international child abduction rules

Other ways to acquire parental responsibility

Parental responsibility can be acquired in other ways:

- adoption - only the adoptive parents will hold parental responsibility
- when a child is placed with prospective adopters they get parental responsibility for the child along with others holding parental responsibility, such as the local authority
- obtaining a parental order following surrogacy
- in the case of step-parents, through agreement with the child's mother - and other parent if that person also has parental responsibility for the child - or as the result of a court order
- being granted a child arrangements order determining that the child should live with him or her, or if the court determines that a parent should only spend time with the child, the court may also decide to grant parental responsibility
- being appointed a guardian or special guardian
- being named in an emergency protection order - although parental responsibility in such a case is limited to taking reasonable steps to safeguard or promote the child's welfare
- A local authority can also acquire parental responsibility, if it's named in the care order for a child.

More than one person, and even several people, can hold and exercise parental responsibility for a child. The parental responsibility of one party does not necessarily stop simply because another person is also given it, although this can happen. Therefore, in some cases, several people may exercise parental responsibility on behalf of a child. Parental responsibility is not given to a foster parent or key worker in residential care.

School must treat all parents equally, unless a court order limits a parent's ability to make educational decisions, participate in school life or receive information about their children. In most circumstances, the question schools must ask themselves when making decisions is not just whether the parent holds parental responsibility but whether they are a parent under education law.

Parental responsibility

This information is taken from 'Understanding and dealing with issues relating to parental responsibility' which can be accessed on <https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility>

In family law, parental responsibility means all the rights, duties, powers, responsibilities and authority that a parent has in relation to the child. A person with parental responsibility can make decisions about the child's upbringing and is entitled to information about their child. For example, they can give consent to the child's medical treatment and make decisions about the child's education. They also have the right to receive information about their child's health and education.

Rights of separated parents

Each person with parental responsibility for a child is entitled to:

- Receive information about their child
- Request to see their child's educational record
- Participate in statutory activities (like parent governor elections)
- Be informed about meetings involving their child (such as parents evenings or an exclusions hearing)
- Be asked to give consent (for things like school trips or sharing photos of the child on your school's website)

This means that one parent can't prevent others with parental responsibility from doing any of the things listed above, and the Trust doesn't need the consent of one parent to allow another parent to do any of these things. For example, a biological parent can't request that the Trust does not share information about a child's education with a step-parent the child lives with. That's because they both count as 'parents' under education law.

Getting consent

For activities and outings, the DfE guidance on parental responsibility sets out that as a Trust we seek consent from the resident parent unless:

- The activity is likely to have a long-term and significant impact on the child, or
- The non-resident parent has asked you to seek their consent in all such cases

We are entitled to act as 'in loco parentis' when children are in our care. This will be invoked where emergency medical treatment is needed so we can act in place of a parent, or seek consent from a parent who may not hold parental responsibility. The parents, including the non-resident parents who has asked to be kept informed, will then be contacted as soon as possible.

The resident parent is the parent the child lives with the majority of the time. If a child lives with each parent for an equal amount of time, both parents would count as resident parents. If parents cannot agree on consent, we will treat it as though consent has not been given. We will offer support to parents in such situations for example advising them to seek independent legal advice or to use an external mediator; we do not get involved in the dispute.

Checking parental responsibility

As part of our intake procedures, and for safeguarding, we get the information we need about parental responsibility on a child's application form. We may check for parental responsibility in situations such as:

- If the child's resident parent doesn't name the non-resident parent on the registration, application or intake form. We will make the resident parent aware that the other parent is entitled to be involved in their child's education and request that information is passed on
- Someone other than the people listed on the pupil's registration form is requesting information about the child
- One parent approaches the school claiming that the other parent doesn't have parental responsibility, or that parental responsibility has been taken away

We follow the Kent local authority guidance on checking parental responsibility.

We can only prevent a parent exercising their rights if:

- There's a court order relating to the child that requires this
- A change of circumstances means someone no longer has parental responsibility (for instance, if the child's mother and step-father divorce, the step-father may lose parental responsibility unless there's an agreement that says otherwise).

Bobbing/Iwade: we have a **separated parents** policy for more details which is available on our website.

Court involvement and Cafcass

If parents go to court, Cafcass can become involved at the request of the court. Cafcass have the responsibility of providing the court with the information needed for a safe decision involving the arrangements for the children. We ask parents to inform us if Cafcass are involved so we have the information to support the children. More information around the work of Cafcass is on <https://www.cafcass.gov.uk/grown-ups/parents-and-carers/>

Where a Child Arrangements order is issued or altered we expect parents to give us a copy as soon as possible so that we follow this to support our duties in safeguarding.

Supporting Children Potentially at Greater Risk of Harm

Whilst **all** children should be protected, each BA-MAT school acknowledges that some groups of children are potentially at greater risk of harm. This can include the following groups:

Safeguarding Children with Special Educational Needs or Disabilities (SEND)

All our schools acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

We recognise that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

To address these additional challenges, our schools will always consider implementing extra pastoral support and attention for children with SEND.

- Bobbing/Iwade: The DSL will work closely with the SENDco (Lauren Gilmour) to plan support as required.
- Grove Park: The DSL will work closely with the SENDco (Mandy Harling) to plan support as required
- Aspire: The DSL team will work closely with the teachers and wider agencies to plan support as required

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

Our SEND team support the development of our policies so that these barriers are given consideration. We meet as a team of DSLs on a regular basis, so we share the caseload and bring fresh eyes to all open cases so that we can carefully reflect on these additional barriers for our children. This caseload review means we can spot any patterns or exceptions for the children and take rapid action.

All schools will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon by 1:1 support and communication interventions, such as Communicate in Print and British Sign Language/Makaton.

Our PSHE & SRE curriculum are designed with our pupils in mind, so contextual issues are addressed. The curriculum delivery allows for the 'over learning' of key messages about being safe, what is safe and unsafe, consistency in rules and clarity in their meaning (to reduce abstraction) and use of prompts to remind children who have memory issues.

Additional support is in place for children at Aspire school as all children in the school have ECHPs. The small classes mean that teaching teams know their children extremely well to support identifying where behaviour may change.

The CEOP link <https://new.thinkuknow.co.uk/professionals/resources/know-your-friends-with-josh-and-sue/> can be used to support SEND children in understanding basic online safety rules. The **safely using of electronic devices, technology and social media** policy for pupils and parents includes Communicate in Print images to support understanding of keeping safe online.

Children Requiring Mental Health Support

KCSIE definition of safeguarding now includes the importance of preventing the impairment of a child's mental health and/or development. All staff will be made 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.

Each school has an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where there are concerns regarding possible mental health problems for pupils, staff should record concerns on CPOMS/My Concern and speak with a DSL. The Trust has a wellbeing team, which consists of a number of teachers and TAs who are trained in counselling and mental health first aid. There is also access to external counselling services. Additionally we are able to pull on support using our FLO/Pastoral teams for signposting as well as Early Help support and the Front Door.

The schools also incorporates age/stage appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience. This is significant within Aspire through the work on life skills.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Any concerns are logged on CPOMS/My Concern, and teachers identify key factors of mental health on the RAPs/shared documents so that these can be easily seen in combination, and then supported. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL.

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education. Iwade and Bobbing Schools staff understand how ACEs may have impacted on their lives and how to support them in school.

See also [Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Within the Trust we recognise the importance that all pupils have someone to speak with. We have a Wellbeing Lead, who offers school counselling as well as Talk Time and counselling from Edify in Bobbing, Iwade and Grove Park schools [EDIFY](#).

Children Missing from Education

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation - particularly county lines. A robust response to children missing from education will support the identification of such abuse and may help prevent the risk of children going missing in the future.

Where possible, the schools will hold more than one emergency contact number for each pupil so we have additional options to make contact with a responsible adult if a child missing from education is also identified as being a welfare and/or safeguarding concern.

Where the Trust have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

Each school has a procedure in place for responding to unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. These policies can be seen on the individual school websites. See also [PRU, Inclusion and Attendance Service \(PIAS\) - KELSI](#)

Elective Home Education

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

[Elective home education - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
[Educating your child at home - Kent County Council](#)

Children who need a Social Worker (child in need and child protection plans)

The DSL will hold details of social workers working with children in the Trust so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children have a social worker, this will inform our decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

Looked after children, previously looked after children and care leavers

Our schools recognise the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

The school has appointed a 'designated teacher' who works with local authorities, including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after. The designated teachers are the Heads of School/Head teacher in each school.

[Designated teacher for looked-after and previously looked-after children - GOV.UK \(www.gov.uk\)](#)

The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

Where the Trust believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.

Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

Children who are Lesbian, Gay, Bi, or Trans (LGBTQ+)

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm, however, our schools recognise that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.

We recognises risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. LGBTQ+ is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns. This is delivered in a stage and cognition appropriate way at Aspire school.

Online safety

It is recognised by BA-MAT Schools that the use of technology presents particular challenges and risks to children and adults both inside and outside of school.

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. All schools will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Each school will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

National Online Safety

BA-MAT schools identify that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We recognise that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face online.

The Head of School/Head Teacher will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

Bobbing/Iwade: For more information about cyber bullying see the **Positive Behaviour Principles** handbook which contains the **anti-bullying** policy and the **online safety** policy.

Aspire/Grove Park: for more information about bullying and online safety, see the relevant policies on the school websites.

Detailed information about the school's response to online safety can be found on the website.

More information for staff can be found on www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/e-safety.

Online hoaxes and harmful challenges

Any member of staff who identifies a potential hoax or harmful challenge which may be putting children at risk should report this on CPOMS/My Concern and flag the DSL team. The DSL team will undertake a case by case assessment to consider if this is a national risk, localised or within the school. Rapid action may prevent the hoax or challenge becoming viral and impacting more children. Decisions about whether to notify parents will be informed by the case assessment.

The DSLs make use of the Kent Education Safeguarding Service and the Professional Online Safety Helpline on <https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline>

Is it an online hoax?

A hoax is a deliberate lie designed to seem truthful. The internet and social media provide a perfect platform for hoaxes, especially hoaxes about challenges or trends that are said to be harmful to children and young people to be spread quickly.

The DSLs will carefully consider if a challenge or scare story is a hoax. Generally speaking, naming an online hoax and providing direct warnings is not helpful. Concerns are often fuelled by unhelpful publicity, usually generated on social media, and may not be based on confirmed or factual occurrences or any real risk to children and young people. There have been examples of hoaxes where much of the content was created by those responding to the story being reported, needlessly increasing children and young people's exposure to distressing content.

Evidence from Childline shows that, following viral online hoaxes, children and young people often seek support after witnessing harmful and distressing content that has been highlighted, or directly shown to them (often with the best of intentions), by parents, carers, schools and other bodies

Is it a real online challenge that might cause harm to children and young people?

An online challenge will generally involve users recording themselves taking a challenge and then distributing the resulting video through social media sites, often inspiring or daring others to repeat the challenge. Whilst many will be safe and fun, others can be potentially harmful and even life threatening.

Where the DSLs are confident children and young people are aware of, and engaged in, a real challenge that may be putting them at risk of harm, it will be directly addressed. This may be through focussed support to a particular age group or individual children at risk. Remember, even with real challenges, many children and young people may not have seen it and may not be aware of it. The DSLs will carefully weigh up the benefits of institution-wide highlighting of the potential harms related to a challenge against needlessly increasing children and young people's exposure to it.

Key questions used to evaluate the risk are:

- Is it factual?
- Is it proportional to the actual (or perceived) risk?
- Is it helpful?
- Is it age and stage of development appropriate?
- Is it supportive?

Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE ['Harmful online challenges and online hoaxes'](#) guidance to ensure we adopt a proportional and helpful response. Local advice and support is available for DSLs and SLT via the Education Safeguarding Service: '[Think before you scare](#)'.

Online Policies and Procedures

Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSLs and DDSs as appropriate, for example when developing curriculum approaches or making technical decisions. However, the DSL is acknowledged as having overall responsibility for online safeguarding within the school.

The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including positive behaviour policies. Concerns will be logged on CPOMS and DSL will be altered.

- Internal sanctions and/or support will be implemented as appropriate. (online behaviour plan implemented with pupil, parent and staff)

Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Our schools use a wide range of technology. This includes laptops, tablets and other digital devices, the internet and email systems.

All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place. The staff handbook also references these policies and staff compliance to these.

All schools recognise the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2022 and EYFS 2021 we have appropriate policies in place that are shared and understood by all members of the school community: **Online safety** policy and **safely using electronic devices technology and social media guide – staff/pupils**. Further information reading the specific approaches relating to this can be found on the schools website. Any concerns raised with online safety are reported in summary to the Governing Body in the Head of School report, along with actions taken.

Appropriate Filtering and Monitoring

Each school does all we reasonably can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.

Each school ensures that appropriate filtering and monitoring systems are in place when pupils and staff access school systems and internet provision. We use a filtering system set by Cantium/Primary Technologies where a daily report, which can be filtered by category, is sent to the IT technician to show what has been accessed. Any concerns are raised immediately to the Head of School/DSL. A summary of any filtering concerns is reported to the Governing body in the Head of School report.

Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

If learners or staff discover unsuitable sites or material, they are required to: report the concern immediately to a DSL and the site to technical staff.

All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.

Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the Lead DSL who will respond as appropriate.

Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police. [Homepage | Internet Watch Foundation \(iwf.org.uk\)](https://www.iwf.org.uk)

The school will be careful to ensure that these systems do not place unreasonable restrictions on internet access or limit what children can be taught with regards to online teaching and safeguarding.

BA-MAT schools acknowledge that whilst filtering and monitoring is an important part of schools' online safety responsibilities, it is only one part of our approach to online safety. Children and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.

Children are taught about online safety across the curriculum and all sign the **safely using electronic devices and social media guide for pupils** which is also shared with their parents. Our **EYFS policy** makes reference to online safety and how devices are monitored within EYFS for safeguarding purposes.

- Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
- Learners' internet use will be supervised by staff according to their age and ability.
- Learners will be directed to use age appropriate online resources and tools by staff.

Information Security and Access Management

Each school is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in acceptable use policies and online safety policy. We will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Educating Learners and Working with Parents

Each school will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively and safely as part of a broad and balanced curriculum.

We will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online. We will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children. We will share information using National Online Safety weekly and encourage parents to sign up to their webinars.

The schools will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This will be provided through the school website.

Education for a Connected World Framework

Teaching online safety in school'

Remote Learning

All schools will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

All communication with learners and parents/carers will take place using school provided and approved communication channels; for example, school/class provided email accounts and phone numbers and agreed systems of Office 365 and Purple Mash.

Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL prior to any contact and recorded on CPOMS/My Concern. The **remote education** policy sets out how remote learning will be implemented.

Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies. If anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately, safeguarding remains everyone's responsibility.

If a child discloses whilst in an online meeting with staff, the usual procedures must be followed. This is likely to mean that the child will need to be contacted separately by video call or phone call so that more information can be gained using TED.

If any member of staff has concerns about live-stream issues by pupils, parents or other members of staff, these should be raised immediately with the senior Team. If the concern is about the senior Team in any school, it should be raised with the CEO

Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Each School will continue to be clear who from the school their child is going to be interacting with online.

Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

[Remote Learning Guidance for DSL \(Education People\).](#)

All schools will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach using NOS.

Staff Engagement and Expectations

Awareness, Induction and Training

All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' 2022 which covers safeguarding information for staff.

- School leaders, including the DSL will read KCSIE in its entirety.
- School leaders and all members of staff who work directly with children will read annex B.

All members of staff have signed to confirm that they have read and understood the national guidance shared with them. A hard copy of KCSIE 2022 is also kept in the STRAT Office.

The Lead DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. This training is regularly updated

and is in line with advice from the safeguarding partners and carried out by the DSL or video with a presentation by the DSL.

A yearly training session is held for all Trust Staff, including MDMs, Catering Company, Site Team, Office Teams, wrap around care staff, Cleaning Staff and all class facing adults. Further to this CPD sessions each term for Class Facing Teams. New staff have full Safeguarding training so that they are also equipped to support our pupils. We enhance our safeguarding training with National Online Safety webinars and other training as outlined throughout the policy. We also offer 'safeguarding on a page' documents to support those staff who do not regularly interact with children so that they can respond in line with the policy. This is followed up by the Trust DSL teams.

All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.

Intimate care may be defined as any activity required to meet the personal care needs of each individual child – full details can be found in the **Intimate Care Policy**

Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively through termly inputs.

Our schools recognise the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies by inviting input at staff meetings or asking staff to respond to the policies and training.

The DSL and Head of School will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.

Although the school has a nominated lead, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

Safer Working Practice

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the Code of Conduct as part of the staff handbook.

The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff Code of Conduct and Acceptable Use Policy (AUP). A guide to the DSL will be shared at the Office for visitors and volunteers to identify DSLs in school.

Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical intervention is only used when the child is endangering

him/herself or others and such events are recorded on CPOMs/My Concern. At Aspire, physical interventions are agreed in an individual behaviour plan, where agreed triggers/situations are listed, along with agreed Team Teach holds. This is agreed with the parents. Any incidents of positive handling will be recorded on Sleuth and in the bound book.

All staff at Aspire are trained in Team Teach. At Aspire, any possible physical interventions are agreed in an individual behaviour plan, where agreed triggers/situations are listed along with agreed Team Teach holds. This is agreed with the parents. Any incidents of positive handling will be recorded on Sleuth and in the bound book.

A number of staff at the mainstream schools are trained in Team Teach.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff handbook/code of conduct, Acceptable Use Policies, and Safely using electronic devices technology and social media for staff.

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

Full advice and guidance can be found in Guidance for Safer Working Practice for Adults who Work with Children and Young People (2019).

Supervision and Support

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.

- Bobbing/Iwade: The Assistant Headteacher of each community will meet with each member of the EYFS team termly to discuss any concerns raised and agree actions and support if needed.
- Grove Park/Aspire – a senior member of the team will provide supervision to the opposite school.

We will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

ECTs and new staff will receive induction training and have a mentor with whom they can discuss concerns including safeguarding concerns.

The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if staff have any concerns about a child's safety or welfare. Included in the Safeguarding Induction will include

knowledge of all staff trained as Designated Safeguarding Leads and training on CPOMS (our safeguarding software system) where concerns are recorded and actions completed. They are directed to specific Safeguarding documents that they need to read.

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly. Further information about a range of supporting organisations can be found in [Appendix 3 on page 62](#).

The schools' Safeguarding team (DSLs and DDSLs) have twice termly supervision meetings. The three aspects are:

- Oversight and accountability, checking through the thinking processes around specific children and ensuring all actions have been followed up appropriately
- Additional CPD sessions run by the Trust Lead DSL including discussing serious case reviews
- Need to recognise that own childhood experiences, cultural background and life events may colour our judgment and need a high level of emotional intelligence to ascertain if there is over-identifying with a child's experience or downplaying its significance
- Effective supervision can see when stress is beginning to take its toll.

The intended impact is:

- Support the safeguarding team
- Improve staff and pupil well-being
- Develop consistent approaches, practices and procedures
- Promote strengths
- Deal with frustrations and possible vicarious trauma of the role
- Have strategies to deal with persistent, challenging or difficult cases and look for patterns
- Reflect on own emotional response
- See things from a different point of view
- Increase confidence
- Explore all avenues for the good of the children and young people

Safer Recruitment and Allegations

Safer Recruitment and Safeguarding Checks

All our schools are committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff. Each school will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)

The Trust Board and Trust Executive Team are responsible for ensuring that the Trust follows safe recruitment processes as outlined within guidance. Including an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role and appropriate pre-appointment checks.

The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training. This is recorded on the school's Management Information System Arbor.

Each school maintains an accurate Single Central Record (SCR) in line with statutory guidance. The SCR is a list of all staff, volunteers and governors and includes appropriate recruitment information such as:

- Dates of recruitment
- References
- Identity Checks
- Criminal Records check reference number, including date check was obtained and details of who obtained it
- Eligibility to work in the UK checks
- Other essential key data

We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.

Where any school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.

The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2022) and the [local Kent allegations arrangements](#). In depth information can be found within our 'Managing Allegations against Staff' and code of conduct policy.

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

[Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership \(kscmp.org.uk\)](https://www.kscmp.org.uk)

Where the CEO/Lead DSLs are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer \(LADO\) Enquiry Line](#) and/or the [Education Safeguarding Service](#).

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the CEO and Head of School (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

Concerns that meet the 'harm threshold'

AT BA-MAT schools, we recognise that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:

- behaved in a way that has harmed a child, or may have harmed a child 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.

Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE.

Allegations that meet the harm threshold will be referred immediately to the CEO/Head of School who will contact the **LADO** to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the CEO/Head of School, staff are advised that allegations should be reported to the chair of Trustees who will contact the LADO.

Concerns that do not meet the ‘harm threshold’

We may also need to take action in response to ‘low-level’ concerns about staff. Additional information regarding low-level concerns is contained within our staff handbook/code of conduct– this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

BA-MAT schools have an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns should be shared confidentially in line with our code of conduct to Head of School

Where low-level concerns are reported to the school, the Head of School will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.

The Head of School will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).

Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.

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

Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

- Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
- Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

Safe Culture

As part of our approach to safeguarding, each school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the schools' safeguarding regime. The leadership team in each school takes all concerns or allegations received seriously.

All members of staff are made aware of our Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk. There are posters displayed in the school to give information to staff.

Each school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

If these circumstances arise in relation to a member of staff at our schools, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO or School Personnel Service.

For specific guidance on how to respond to allegations against staff, please refer to the **“Procedures for Managing Allegations Against Staff” and Whistle Blowing Policy** which are held on SharePoint

When in doubt – consult.

Opportunities to teach safeguarding

At our schools we will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through RSE curriculum. We will also supplement our curriculum with NSPCC safeguarding programs such as Pantasaurus as well as give opportunities to attend workshops to support their safeguarding understandings. This is delivered in a stage and cognitive appropriate way at Aspire school.

We recognise that our schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned.

Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

Each of our schools recognise the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

Each school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.

Our schools recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND. Our school systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

Physical Safety

Use of 'reasonable force'

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Positive Behaviour Principles/behaviour policy and is in line with the DfE ['Use of reasonable force in schools'](#) guidance. Any use of Team Teach positive handling techniques are recorded on CPOMS/My Concern or in the Bound book/Sleuth at Aspire school.

The Use of Premises by Other Organisations

Where services or activities are provided separately by another body using the school facilities and premises, the Head of Schools and Governing Body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

Site Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance.

Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

Volunteers

Volunteers have a DBS enhanced check when they apply as part of their safeguarding checks. Once this is received, they can commence voluntary service with us. They receive safeguarding training as part of their induction.

Visitors and contractors

Visitors or contractors on site will receive safeguarding information with practice-based information regarding knowledge of what to do if there is a concern and the appropriate use of phones and tablets. This is available in a leaflet kept at reception or it will be given to contractors by the Site Manager.

When the visitor or contractor attends site, they will sign in, have their ID checked and then be accompanied on site if they do not have a valid DBS check in place. The visitor or contractor will then be given a red visitor lanyard which they must wear at all times on site, along with their work ID, unless these must be removed for health and safety reasons which can only be agreed by the Site Manager. The lanyard must be replaced as soon as possible.

Approved Visitors and Contractors

The Offices at each school will hold a secured list of approved visitors and contractors who have had DBS checks in place. Information about the checks this will be recorded and shared at both schools via a restricted Teams. DBS confirmation can also be received from the company which employs the visitor and contractor. This will also be stored on the Single Central Register and personal data will be kept in line with the Retention policy and reviewed at least annually

Approved visitors and contractors will have their ID checked when they attend site and then they will be given a blue visitor lanyard which will indicate to staff that this visitor is checked and allowed to be unaccompanied whilst on site.

Teaching staff who visit from other schools who show their school ID will then be given a blue visitor lanyard.

See also **Managing contractors** policy for more information.

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

Local Support

All members of staff at the schools are made aware of local support available.

- **Education Safeguarding Service**
 - **Area Safeguarding Advisor**
 - Swale - 03000 418 503
 - **Online Safety in the Education Safeguarding Service**
 - 03301 651500
 - onlinesafety@theeducationpeople.org (non-urgent issues only)
- **LADO Service**
 - Telephone: 03000 410888
 - Email: kentchildrenslado@kent.gov.uk
- **Integrated Children's Services**
 - Front door: 03000 411111
 - Out of Hours Number: 03000 419191
- **Early Help**
 - www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-services
 - www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts
- **Kent Police**
 - 101 or 999 if there is an immediate risk of harm
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - kscmp@kent.gov.uk
 - www.kscmp.org.uk
 - 03000 421126
- **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

Appendix 1: Categories of Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children. All members of staff should read and understand part one of 'Keeping children safe in education' 2016 and staff who have direct contact with pupils should also read annex A.

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

Signs that MAY INDICATE Sexual Abuse

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

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth

- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of the torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts
- Injuries need to be accounted for Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern

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

Signs that MAY INDICATE emotional abuse

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

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

access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

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

Appendix 2: Keeping yourself safe when responding to disclosures

(the 6 Rs – what to do if...)

1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what is being said

2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep eg “It will be alright now”
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it eg “You’re not to blame”
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil as far as is necessary for you to establish whether or not you need you need to refer the matter but do not interrogate for full details
- Do not ask leading questions: “Did he/she..?” Such questions can invalidate evidence
- Do ask open “TED” questions: Tell, explain, describe
- Do not criticise the perpetrator, the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and **the words used by the child.** Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

5. Remember

- Contact the Designated Safeguarding Lead (DSL)
- The DSL may be required to make appropriate records available to other agencies
- KSCMP: www.kscMP.org.uk

6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals

Appendix 3: National Support Organisations

Additional links can also be found in KCSIE 2022

Reporting child abuse to the local Authority, NSPCC or Police <https://www.gov.uk/report-child-abuse>

NSPCC 'Report Abuse in Education' Helpline 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrensociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for Pupils

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

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Support for Learning Disabilities
- Respond: www.respond.org.uk
- Advice now: www.advicenow.org.uk
- Mencap: www.mencap.org.uk

Support for Learning Disabilities

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

Domestic Abuse

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

Honour based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage:
www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

CSE and CCE

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

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

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

Online Safety

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

Mental Health

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

Radicalisation and hate

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

Children with Family Members in Prison

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

Contextual Safeguarding Network

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

Kent Resilience Hub

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

Substance Misuse

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

Appendix 4: Trust CPOMS categories and processes

Safeguarding is all our responsibility therefore :

- **High Priority** tab should be ticked for incidents which need URGENT action
- Concerns should be recorded on CPOMS as soon as possible but before 12pm (morning concerns) or before 3pm (afternoon concerns)
- When writing a concern ensure you write **full names, facts and pupil's own words** where ever possible without your interpretations
- Actions by FLO, DSLs, Community L or Assigned Staff to be recorded on CPOMS by the end of the day
- Teacher and/or DSL meetings with parents arranged by the end of the day and where possible had the same day.
- Monitoring action should be completed within 24 hours of the initial alert – and updated as stated
- Referrals should be made promptly within 24 hours but ideally the same day
- 'Check in' requests should be emailed or recorded on CPOMs with an Alert to who should be carrying out this monitoring
- Check in should be updated on CPOMs weekly, or if a concern by the end of that day.
- Please ask to find out what has happened with your concern should you not have been notified

For DSLs

- Complex cases to be reviewed twice a term at the DSL supervision along with tracking of discussions and reasons for keeping open or closed
- Cases with multiple entries in a short term to be discussed during DSL Supervision
- Keep those who have raised actions informed that you have taken steps – even if you can't share the details.

Main Category	ATTENDANCE	BEHAVIOUR	SAFEGUARDING	WELL-BEING
Sub Categories	<ul style="list-style-type: none"> • High Priority • Attendance Concern • Punctuality Concern • Communication with parent • Penalty notice issued • FLO involved 	<ul style="list-style-type: none"> • High Priority • General Behaviour Incident • Online Incident • Online TEAMS • Verbal Bullying • Physical Bullying • Racist Incident • Restorative Justice conversation • CyberBullying • Racist Incident • Homophobic/Biphobic/Transphobic Incident • Verbal/Aggressive to peers • Verbal/Aggressive to adults • Positive Handling • FLO involved • Derogatory Language Used • Discriminatory (in. Sexist/Disability) • Internal Exclusion 	<ul style="list-style-type: none"> • High Priority • Emotional related • Physical related • Neglect related • Sexual related • Sexual Violence • Child on Child abuse • Domestic Abuse • Grooming • FGM • Operation Encompass • Court order in place • Outside agency contact • Early Help • CHIN • CP • FLO involved • County Lines 	<ul style="list-style-type: none"> • High Priority • Concern for the well-being of the child • Concern for the well-being of the parent • Medical Incident • Change in home circumstances • Parents in conflict • Housing concerns • Outside agency contact • FLO involved • Behaviour concern outside of school • Covid Related
MUST alert:	Comm. Lead Head of School FLO Emma Edwards	Comm. AHT/Comm. Lead (Of community involved) Strat Team Behaviour Lead FLO	DSL team	Comm. AHT/Comm. Lead (Of community involved) FLO Wellbeing Lead
Assign to:	Comm. Lead	Comm. Lead or Head of School	Head of School	Comm. AHT/ Comm. Lead Head of School SENCO

Note: Where a parent reports an incident of bullying, this should be coded in the first instance as Parent concern whilst it is investigated fully. This is to ensure our internal reporting mechanisms.

If incident relates to a child with a SEND/ILP/EHCP please alert Lauren Gilmour

Aspire: My Concern

All adults in school have access to My Concern. Once a concern has been raised, the duty DSL will read and assign a case owner to the concern.

Concern around:	Child with Social Worker or Early Help Worker	Child with no SW/EH but is an urgent safeguarding concern	Child with no SW/EH and is not an urgent safeguarding concern
MUST alert:	Lead DSL Tracy	Lead DSL Tracy	Duty DSL
Assign to:	Appointed DSL	Duty DSL	Class Teacher

If in any doubt, staff should consult the lead DSL Tracy.

Appendix 5 – Making a referral to Social Care

- Please speak to the Lead DSL before making a referral
- You may need to speak to a member of the Education Safeguarding Team before hand to discuss your thoughts and next steps - 03000 418503
- You may also ring for consultation with the Integrated Front Door: 03000 411111 (outside office hours 03000 419191)

Making the Referral

- Have CPOMS/My Concern open as you will be able to use this for DOB and addresses that are required for the form. It may also be helpful to have the child's file as sometime cross checking information is useful.
- Click on the Hyperlink it will then take you to the Front Door – which is now all digital
- <https://webapps.kent.gov.uk/KCC.ChildrensPortal.Web.Sites.Public/Default.aspx>
- A guide to the Front door referral <https://www.youtube.com/watch?v=zganVVc5-bY>
- Complete the form use evidence from CPOMS/My Concern and if there is lots record it chronologically. If you believe they are at risk of harm you need to get that across - we are always happy to write in pairs.
- PARENT SHOULD AGREE TO THE REFERRAL UNLESS THE CHILDREN ARE AT RISK OF HARM
- It will ask for concerns and what you hope the resolution to be – be exact
- There is a box for additional information – anything else you think they should know - it might seem incidental but remember you know these children well.
- Once completed - save the form and upload to CPOMS/My Concern and click submit

Appendix 6 – Statutory assessments – information for DSLs

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately.

Children in need – section 17 - CiN

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm – section 47 – Child Protection

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

The Local Authority should respond within 1 working day. Where this fails to be the case, the DSL will continue to call and follow up. These calls will be logged on CPOMS.