



# **Safeguarding and Child Protection Policy**

Safeguarding Policy This policy applies to Steephill Independent School, including the EYFS setting.

Policy Authors:

Helen Millward - Head Teacher

Claire Ross - Deputy Head

Sarah Spender - EYFS Leader

Reviewed and approved by:

- Hazel Thurgood Governor responsible for Safeguarding:
- Full Governing Body:

Next review due: September 2026

Key Safeguarding Contacts	1
Introduction and Ethos	2
Definition of Safeguarding	3
Legal framework	4
Related Safeguarding Policies	5
Key Responsibilities	6
Governance and Leadership	7
Recognition and Types of Abuse, Neglect and Exploitation	8
Safeguarding and Child Protection Procedures	9
Record-Keeping	10
Multi-agency Working	11
Complaints	12
Specific Safeguarding Issues	13
Child on Child Abuse	14
Child on Child Sexual Violence and Sexual Harassment	15
Nude and/or Semi-Nude Image Sharing by Children	16
Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	17
Serious Violence	18
So-called honour-based abuse	19
Preventing radicalisation	20
Cybercrime	21
Domestic Violence	22
Supporting Children Potentially at Greater Risk of Harm	23
Children who are Privately Fostered	24
Online Safety	25
Staff Engagement and Expectations	26
Safer Recruitment and Allegations	27
Security	28
The Use of School Premises by Other Organisations	29
Opportunities to teach safeguarding	30
Physical Safety	31
Local Support	32
National Support	33

## **1. Key Safeguarding Contacts**

**Designated Safeguarding Lead:** Helen Millward (Head Teacher), Claire Ross (Deputy Head)

**Deputy Designated Safeguarding Lead:** Sarah Spender (EYFS Lead)

**Named Safeguarding Governors:** Mrs Hazel Thurgood

### **Kent Safeguarding Children Multiagency Partnership- KSCMP**

Telephone: 03000 42 11 26

Email: [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)

Address: Room 2.71, Sessions House, Maidstone, ME14 1XQ

### **Local Authority Designated Officer (LADO)**

Telephone: 01634 331 065

Email: [child.protection@medway.gov.uk](mailto:child.protection@medway.gov.uk)

Local Police Force

Telephone: 101 (the non-emergency police number)

### **Prevent**

Preventing Extremism in Schools and Children's Services

[counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

Telephone 020 7340 7264

Department for Education (DfE) – 0207 340 7264 [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

## 2. Introduction and Ethos

- Steephill Independent School recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is everybody's responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks and pupils/students) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- Steephill Independent School believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and have their wishes and feelings taken into account and that all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff, volunteers and Governors working with children at Steephill Independent School are advised to 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 immediately.
- This policy applies where there are any child protection concerns regarding children who attend Steephill Independent School but may also apply to other children who are connected to the school, for example, siblings or younger members of staff (under the age of 18) or children on student/work placements.
- Steephill Independent School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what service to provide.
- Steephill Independent School recognises the importance of adopting a trauma-informed approach to safeguarding. The school understands there is a need to understand the root cause of children's behaviour and consider any underlying trauma.

Our school core safeguarding principles are:

- **Prevention** – positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures;
- **Protection** – following the agreed procedures, ensure all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns;
- **Support** – adopt a child-centred approach and provide support for all pupils/students, parents/carers and staff and, where appropriate, implement specific interventions for those who may be at risk;
- **Collaboration** – with both parents/carers where possible and other agencies – to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

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

- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE. All school staff (including temporary staff and volunteers) will have access to a copy of this policy and it will also be available to parents/carers. The policy will be reviewed annually.
- 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 as appropriate.
- Parents/carers can obtain a copy of this policy and other related policies from the school website or the school office.

### **3. Definition of Safeguarding**

- “Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education.” (Inspecting safeguarding in early years, education and skills settings, Ofsted, September 2018).

- All safeguarding policies will be reviewed on an annual (minimum). The Designated Safeguarding Lead / Head Teacher will ensure regular reporting on safeguarding activity and systems in school.
  
- In line with KCSIE, safeguarding and promoting the welfare of children is defined for the purpose of this policy as:
  - Providing help and support to meet the needs of children as soon as problems emerge;
  - Protecting children from maltreatment, whether that is within or outside the home, including online;
  - Preventing impairment of children’s mental and physical health or development;
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
  - Promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible, and where this is in the best interests of the child/children;
  - Taking action to enable all children to have the best outcomes.
  
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering or likely to suffer significant harm. This includes harm that occurs inside or outside the home, including online.
  
- Steephill Independent School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect;
  - Bullying (including cyber-bullying);
  - Child-on-child abuse;
  - Children with family members in prison;
  - Children who are absent or missing from education;
  - Child missing from home or care;
  - Child Sexual Exploitation (CSE);
  - Child Criminal Exploitation;
  - Contextual Safeguarding (risks outside the family home);
  - County Lines and gangs;
  - Domestic abuse;
  - Drugs and alcohol misuse;
  - Fabricated or induced illness;

- Faith abuse;
- Gender based abuse and violence against women and girls;
- Hate;
- Homelessness;
- Human Trafficking and Modern Slavery;
- Mental health;
- Missing adults and children;
- Nude or semi-nude image sharing, also known as 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 Appendix 1: Categories of Abuse (‘Keeping Children Safe in Education’).

#### 4. Legal Framework

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:

- DfE guidance Keeping Children Safe in Education 2024 (KCSIE);
  - Working Together to Safeguard Children (WTSC);
  - Ofsted: ‘Education Inspection Framework’;
  - Framework for the Assessment of Children in Need and their Families (2000);
  - Kent and Medway Safeguarding Children Procedures (online);
  - Early Years and Foundation Stage Framework (EYFS);
  - Education Act 2002;
  - Education and Inspections Act 2006; Human Rights Act 1998;
  - Equality Act 2010 (including the Public Equality Duty);
  - The Education (Independent School Standards) Regulations 2014;
  - The Non-Maintained Special Schools (England) Regulations 2015.
  - [Working together to improve school attendance - GOV.UK](#)
- 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 pupils under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

Steephill Independent School will follow local or national guidance in response to any emergencies. The school will amend this policy and their procedures as necessary but, regardless of the actions required, safeguarding principles will always remain the same and the welfare of the child is paramount.

## **5. Related Safeguarding Policies**

This policy should be read in conjunction with the policies which cover (but are not limited to) the subjects and procedures below:

- Positive Behaviour;
- Anti-Bullying;
- Data Protection and Information Sharing;
- Image use;
- Sex and Relationship Education;
- Personal and Intimate Care;
- Health and Safety;
- Attendance;
- Risk Assessments (e.g. school trips, use of technology);
- First Aid and Accidents, including medication and managing illness, safer eating and allergies, health and safety, and infection;
- Managing Allegations Against Staff;
- Staff Behaviour Policy / Code of Conduct of Staff (including Acceptable Use of Technology); Safer Recruitment;
- Whistleblowing; Supporting guidance to be read and followed alongside this document:
- ‘Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings’;
- ‘What to do if you are worried a child is being abused’;
- Early Years Foundation Stage (EYFS) Statutory Framework: The Safeguarding and Welfare Requirements.

## **6. Key Responsibilities**

- The Head Teacher, Leadership Team and all staff have read and will follow KCSIE. They will also adopt, understand and follow the school’s Safeguarding and Child Protection Policy and procedures
- The school has a nominated link governor for safeguarding. The nominated link governor will support the DSL and will take the lead role to ensure that the school

has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

- The Head Teacher and Leadership Team will ensure that the DSL is properly supported in their role.

## **7. Governance and Leadership**

- The Governing Body and Leadership Team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Governing Body has regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Governing Body has a duty to ensure that they receive appropriate Safeguarding and Child Protection training upon their induction and that this training is updated regularly.
- The school has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, and that the policies are reviewed at least annually and when required.
- The Governing Body must be 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.
- The Head Teacher will ensure that our child protection and safeguarding policies and procedures are understood and followed by all staff.

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

- The school has appointed a member of the Leadership Team (Helen Millward, Head Teacher and Claire Ross, Deputy Head) as the Designated Safeguarding Lead (DSL). The Deputy Safeguarding Lead is Sarah Spender (Head of EYFS).

- The DSL has overall responsibility for the day-to-day oversight of safeguarding child protection systems, (including online safety and understanding the filtering and monitoring systems in place) in school. While the activities of the DSL may be delegated to the Deputy, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any Deputy DSL training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The Head Teacher will be kept informed of any significant issues by other members of the safeguarding team.
- **It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. This includes but is not limited to:**
  - Act as the central contact point for all staff to discuss any safeguarding concerns;
  - Maintain a confidential recording system for safeguarding and child protection concerns;
  - Monitoring pupil attendance in line with [Working together to improve school attendance - GOV.UK](#) and the attendance policy;
  - Co-ordinate 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);
  - Liaise with other agencies and professionals in line with KCSIE and WTSC 2018;
  - Ensure that locally established procedures are put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed as necessary;
  - Represent, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences);
  - Manage and monitor the school's role in any multi-agency plan for a child;
  - Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns;

- Ensure adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
- Take lead responsibility for online safety, including understanding the filtering and monitoring systems in place;
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and school leadership staff;
- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and / or out of terms activities;
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Inform the Head Teacher of any significant safeguarding issues.

### **Members of Staff**

- The school's staff play a particularly important role in safeguarding as they are in a position to observe any changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- **All members of staff, volunteers and Governors have a responsibility to:**
  - Consider, at all times, what is in the best interest of the pupil/student;
  - Maintain an attitude of 'it could happen here' where safeguarding is concerned;
  - Provide a safe environment in which children can learn;
  - Be prepared to identify children who may benefit from early help and understand the early help process and their role in it;
  - Understand the early help process and their role in it;
  - Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction;
  - Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated;
  - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989;

- Know what to do if a child says that he or she is being abused, neglected or exploited, and understand the impact abuse, neglect and exploitation can have upon a child;
- Be able to identify and act upon indicators 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, neglect and exploitation so that they are able to identify cases of children who may need help or protection;
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe;
- Speak to the DSL/DDSL if they are unsure how to handle safeguarding matters;
- Follow Teachers' Standards to ensure safeguarding wellbeing of pupils/students as part of their professional duties (specific to teaching staff);
- Report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

### **Children and Young People**

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

### **Parents and Carers**

- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant school policies and procedures;
  - Talk to their child 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.

Parents/carers can obtain a copy of the school Safeguarding and Child Protection Policy and other related policies on request and can view them via the school website.

## **8. Recognition and Types of Abuse, Neglect and Exploitation**

- All staff, volunteers and Governors in school are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children and Keeping Children Safe in Education (KCSIE). This is outlined locally within the Kent Support Levels Guidance.
  
- There are four categories of abuse:
  - Physical abuse;
  - Sexual abuse;
  - Emotional abuse;
  - Neglect.
  
- Members of staff are aware that child welfare concerns may arise in 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 the child is being harmed, however, all concerns should be taken seriously and be explored by the DSL on a case-by-case basis.
  
- Steephill Independent School recognises abuse, neglect, exploitation and other 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 will always raise concerns with the DSL.
  
- Parental behaviours may also indicate child abuse, neglect or exploitation, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents/carers who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.
  
- Children may report child abuse, neglect or exploitation happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

- Safeguarding incidents and / or behaviours can be associated with factors and risks outside the school and / or can occur between children off-site. Children can be at risk of child abuse, neglect 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 as well as face to face and, in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- By understanding the indicators of child abuse, neglect or exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.
- Be aware that a pupil may not feel ready to know how to tell someone that they are being abused, neglected or exploited, and/or may not recognise their experiences as harmful.

## **9. Safeguarding and Child Protection Procedures**

All members of staff, volunteers and Governors 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' 2015.

- In all cases, if staff are unsure, they will always speak to the DSL or Deputy DSL.
- The school recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

### **Early Help**

- Early help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst

utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

- Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:
  - Are disabled, have certain health conditions, or have specific additional needs.
  - Have SEND, regardless of whether they have a statutory EHC plan.
  - Are suffering from mental ill health.
  - Are young carers.
  - Are bereaved.
  - Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
  - Are frequently missing or going missing from care or from home.
  - Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
  - Are at risk of being radicalised.
  - Are viewing problematic or inappropriate online content or developing inappropriate relationships online.
  - Have family members in custody or is affected by parental offending.
  - Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
  - Are misusing drugs or alcohol.
  - Have returned home to their family from care.
  - Are at risk of HBA, such as FGM or forced marriage.
  - Are privately fostered.
  - Are missing education, or persistently absent from school, or not in receipt of full-time education.
  - Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.
  - Show early signs of abuse and/or neglect in other ways.
  
- The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:
  - Bereaved.
  - Viewing problematic or inappropriate online content or developing inappropriate relationships online.
  - Have recently returned home to their family from care.

- Missing education, or are persistently absent from school, or not in receipt of full-time education.
- Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.
- The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.
- Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral for assessment for statutory services if the pupil's situation is not improving or is worsening.

### **Responding to Child Protection Concerns**

- If staff are made aware of a child protection concern, they are expected to:
  - Listen carefully to the concern and be non-judgemental;
  - Only use 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 about how the report will be progressed;
  - Record the concern in line with the school's record-keeping requirements;
  - Inform the DSL or Deputy as soon as practically possible.
- The DSL or 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. Staff should speak to a member of the Senior Leadership Team and / or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door.
- Steephill Independent School will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: <https://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) and are accessed via the 'Front Door Service'/Kent Children's Services Portal.
- 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
- If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
- Where Intensive Support Early Help (provided by ICS, outlined in the KSCMP support levels guidance) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the Kent Children's Services Portal.
- Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.
- 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), intensive or specialist support is required and a 'request for support' will be made immediately to Kent Integrated Children's Services (via the portal) and/or the police, in line with the Kent Support Level Guidance and KSCMP procedures.
- The 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 a social worker via the Front Door Service before deciding next steps.
- The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals. However, all staff are made aware of the local 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.
- 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).
- If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.
- Staff will speak to a member of the school/college senior leadership team, request a consultation with a social worker from the Front Door Service, or make a request for support to the Front Door Service themselves.
- In these circumstances, any action taken by staff will be shared with a DSL as soon as is possible.
- In the event of a request for support to the Front Door Service 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 always be informed in the case of a request for support being submitted by the school/college, unless there is a valid reason not to do so, for example, if informing them may put a child at risk of harm or could undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding

receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the Kent Escalation and Professional Challenge Policy to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

- DSLs and staff will be mindful of the need for the school/college to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school/college where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.
- The school will consider a family group decision-making forum is appropriate to determine the help and support the family network can provide for a pupil/student where concerns have been raised about their safety and wellbeing.

## **10. Record-Keeping**

### **Safeguarding Record-Keeping: “Records That Tell a Story”**

Steephill School recognises the importance of maintaining accurate, comprehensive, and chronological safeguarding records that reflect the full narrative of a child's welfare. Effective record-keeping supports timely action, informed decision-making, and continuity of care.

#### **Key Principles**

- **Use of CPOMS:**
  - All safeguarding and welfare concerns, observations, and actions are recorded using CPOMS, ensuring a secure, centralised, and accessible system for safeguarding information.
- **Accuracy and Detail:**
  - Records on CPOMS must document dates, times, concerns, observations, completed body maps, if visible injuries have been observed, actions taken, and follow up outcomes.
  - Child Protection records will record facts and **not personal opinions.**

- If there is an immediate concern, the member of staff should consult with the DSL before completing a CPOMS referral as reporting urgent concerns takes priority.
  - 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 actions taken, decisions reached and the outcome.
  - Child Protection records are kept for individual children and are maintained separately from all other records relating to the child in the school. Records are kept confidentially in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- **Chronology and Narrative:**
    - Each CPOMS record should present a cohesive narrative, allowing anyone reviewing the case to understand the progression of concerns, interventions, and outcomes.
    - Patterns or repeated issues should be highlighted where relevant.
- **Review and Escalation:**
    - Regular Reviews: Safeguarding records on CPOMS must be reviewed at set intervals or when new information arises to ensure cases are actively monitored and not left unresolved.
    - Escalation Triggers: Any new or escalating concerns should prompt immediate review and, where necessary, referral to appropriate safeguarding authorities.
    - Closure and Follow-Up: When a case is resolved, CPOMS entries must clearly document actions taken, outcomes, and any ongoing support or monitoring required.
- **Confidentiality and Security:**
    - CPOMS records are treated as highly confidential and are stored securely in accordance with school policies and data protection legislation.
    - Access is limited to staff with designated safeguarding responsibilities.
    - All Child Protection records will be transferred in accordance with data protection legislation to the child's subsequent school / setting, under confidential and separate cover as soon as possible. These will be given to the new DSL and a receipt of delivery will be obtained.

- In addition to the Child Protection file, the DSL will also consider if it would be appropriate with the DSL at the new school or college in advance of the child leaving, for example, information that would allow the new school or college to continue to provide support.
- Safeguarding records relating to individual children will be retained in line with the Data Protection Policy.
- Where Steephill Independent School receives Child Protection files, the DSL will ensure key staff such as the Special Educational Needs Co-Ordinators (SENCOs/named person with oversight for SEN) will be made aware of relevant information required.
- Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of that inquiry.
- CPOMS records are kept securely on the central database which can only be accessed by the DSL and members of the Safeguarding Team.
- The Head Teacher will be kept informed of any significant issues by the DSL.

### **Roles and Responsibilities**

The Designated Safeguarding Lead (DSL) is responsible for ensuring that all CPOMS records are comprehensive, up-to-date, and regularly reviewed.

Staff who log concerns on CPOMS are responsible for timely and accurate entries and for alerting the DSL to any urgent or escalating issues.

This approach ensures that safeguarding records on CPOMS are not merely a log of events but a living document that tells the story of each child's welfare journey, supporting effective intervention and the safeguarding of all pupils.

### **11. Multi-agency Working**

- Steephill Independent School contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.
- The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

- The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.
- Where a need for early help is identified, the school will allow access for Children's Services from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE.
- The school will reflect the DfE's expectations to secure strong multi-agency working by:
  - Collaborating with services to achieve shared goals and share information.
  - Learning from evidence and sharing perspective to evaluate provision.
  - Prioritising and sharing resources depending on pupils' needs.
  - Celebrating inclusivity and diversity and challenging discrimination.
  - Mutually and constructively challenging other's assumptions in a respectful manner.

### **Confidentiality and Information Sharing**

- Steephill Independent School recognises its duty and power 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.
- Where reasonably possible, the school will hold more than one emergency contact number for each pupil/student. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.
- All staff will be provided with training and information to ensure they have due regard to the relevant Data Protection principles, which allow them to share and/or withhold personal information.
- The Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) places duties on schools and individuals to process personal information

fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act and the 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.

- DfE Guidance on Information Sharing (July 2018) provides further detail. Decisions to share or not to share and why are recorded on any referrals made. Should anyone contact the school requesting information - checks are made as to who they are and from what service. Where necessary and appropriate, parents/carers are contacted to authorise the sharing of information. Alternatively, advice is sought from the Kent Safeguarding Team or through contact with Social Services or Kent LADO Education Safeguarding Advisory Service (LESAS) should the allegation be against a member of staff.
- All members of staff must be aware that while they have duties to keep information confidential, 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. All staff, volunteers and Governors are aware that they cannot promise a child to keep secrets that might compromise the child's safety or wellbeing.
- All staff, volunteers and Governors at Steephill Independent School recognise that all matters relating to child protection are confidential. The Head Teacher or DSL will only disclose information about a student to other members of staff on a 'need to know' basis.
- Prevent guidance clarifies where it is appropriate to rely on consent for information-sharing in relation to students who could be at risk of radicalisation. The guidance states that education providers should consider whether it is appropriate to rely on the student's consent for information-sharing – in the case of younger pupils or those with certain needs, consent may be provided by their parents. If the school does not obtain consent, or it is not possible to rely on consent, it may still be possible to share the personal information if there is a lawful basis for doing so and compliance with data protection legislation is maintained.

## **12. Complaints**

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents/carers, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the school website.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
- Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- The leadership team at Steephill Independent School will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
- Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with this policy.

## **13. Specific Safeguarding Issues**

- Steephill Independent School is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm – see Appendix 4 of this policy.
- In addition to Part One, DSLs, school leaders and staff who work directly with children will read annex B of KCSIE 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 identified by the school and speak with the DSL or a deputy.

#### **14. Child on Child Abuse**

- All members of staff at Steephill Independent School recognise that children are capable of abusing their peers, and that it can happen both inside and outside school and online.
- Steephill Independent School 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 peers – sometimes known as ‘teenage relationship abuse’;
  - 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, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- Steephill Independent School believes that abuse is abuse and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- Steephill Independent School recognises that even if there are no reported cases of child on child abuse, such abuse is still likely to be taking place.

- All staff, volunteers and Governors have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some child on child abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- 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 antibullying, acceptable use, behaviour, and safeguarding and child protection policies. Section 89(5) of the Education and Inspections Act 2006 gives Head Teachers 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.
- In order to minimise the risk of child on child abuse, Steephill Independent School will:
  - Ensure a robust Anti-Bullying Policy is implemented at all times;
  - Ensure staff training is regularly kept up to date;
  - Ensure all students are provided with an age/ability appropriate Personal Development curriculum, as well as an appropriate RSE curriculum;
- Steephill Independent School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child on child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by child on child abuse will be supported by:
  - Pastoral staff who will listen carefully and take any reports seriously, avoiding victim blaming;
  - Pastoral staff will also liaise with parents/carers appropriately;

- All staff, volunteers and Governors who will ensure school policies, with regards to anti-bullying, behaviour, and safeguarding and child protection procedures are followed when they become aware of any concerns;
- Provision of in-house counselling services and external agencies where appropriate.

○

## **15. Child on Child Sexual Violence and Sexual Harassment**

- When responding to concerns relating to child on child sexual violence or harassment, Steephill Independent School will follow the guidance outlined in Part Five of KCSIE and the DfE ‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’ guidance.
- Steephill Independent School recognises that sexual violence and sexual abuse, and all staff, volunteers and Governors will maintain an attitude of ‘that could happen here’. Steephill Independent School recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously 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 be made to feel ashamed for making a report.
- Abuse that occurs online or outside the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- Steephill Independent School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.
- Steephill Independent 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.

- When there has been a report of sexual violence or harassment, 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 5 of KCSIE and relevant local/national guidance and support, for example, KCSMP procedures.
  - 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 and/or the Police.
  - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or school/college staff, and, any other related issues or wider context.
  
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Front Door Service.

## **16. 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 nonconsensual image sharing and should be read and understood by DSLs working with all age groups, not just older learners.

- Steephill Independent School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
  
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, 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.
  - Not say or do 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.
  - Not ask the child or children involved in the incident to disclose information regarding the imagery and 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.
  
- 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 ICS and/or the police immediately if:
    - ◆ the incident involves an adult (over 18).

- ◆ there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- ◆ the image/videos involve sexual acts and a child under the age of 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.

### **17. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

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

### **18. Serious Violence**

- All staff are made 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.
- Any concerns regarding serious violence 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.

## **19. So-called honour-based abuse**

- So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with this policy. Staff will report any concerns about HBA to the DSL (or Deputy).
- All staff will speak to the DSL or Deputy if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information – 0207 008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
  - Section 5b of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl;
  - It will be rare for teachers to see visual evidence, and they should not be examining pupils/students, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on how and when to make a report can be found at Mandatory reporting of female genital mutilation procedural information and FGM Mandatory reporting Duty Fact Sheet;
  - Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL or Deputy, and Kent Integrated Services should be informed as appropriate.

## **20. Preventing radicalisation**

- Steephill Independent School recognises that children may be susceptible to radicalisation into terrorism.
- Steephill Independent School is aware of our duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty

and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

- Steephill Independent School recognises that children are vulnerable to extremist ideology and radicalisation and staff will appropriate training to enable them to be alerted to changes in children's behaviour which could indicate that they may be in need of help or protection.
- The school will continue to carry out risk assessments for how pupils/students or staff may be at risk of being radicalised into terrorism, taking into account the risk of online radicalisation.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow.
- The identified Prevent Lead will be given more in-depth training in relation to extremist/terrorist ideologies, how to make referrals and how to work Channel panels. Training should be updated at least every two years.

## **21. Cybercrime**

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

## 22. Domestic Violence

- Steephill Independent School recognises that:
  - Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
  - Domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
  - Children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
  - Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
  - Domestic abuse can take place within different types of relationships, including ex-partners and family members.
  - There is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
  - Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
  - Domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
  - It is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
  
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
  
- Steephill Independent School is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
  - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.

- Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child's welfare.
- Where the school is unsure of how to respond to a notification, advice may be sought from the Education Safeguarding Service or the Operation Encompass helpline which is available 8am to 1pm, Monday to Friday on 0204 513 9990.

## Mental Health

- All staff, volunteers and Governors 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.

## Bruising in non-mobile children

- Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.
- If the school is concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the 'Kent and Medway Protocol for the Management of Actual or Suspected Bruising in Infants and Children who are not Independently Mobile' procedures (2.2.8 of the KSCMP procedures). In summary, these procedures state:
  - If a child appears seriously ill or injured, emergency treatment should be sought through an emergency department (ED) and the Kent ICS should be notified of the concern and the child's location.
  - In all other cases:

- ◆ Staff must inform the DSL immediately and describe and document accurately on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
- ◆ Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.
- ◆ If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to Kent ICS, who have responsibility for arranging further multi-agency assessments.
- ◆ If there are concerns regarding the immediate safety of the child or staff, the police will be called.
- ◆ If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the Front Door Service.

### **23. Supporting Children Potentially at Greater Risk of Harm**

- While all children should be protected, some groups of children are potentially at greater risk of harm.
- Some children may also be more at risk from specific issues, such as:
  - Sexual violence;
  - Homophobic/transphobic/bi-phobic bullying;
  - Racial discrimination.

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

- Steephill Independent School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect or exploitation.
- Steephill Independent School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be 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, neglect or exploitation, 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 school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.
- The school has robust Personal and Intimate care policies which ensure the health, safety, independence and welfare of children is promoted, and their dignity and privacy is respected.
- Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems.

#### Children Requiring Mental Health Support

- 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.
- 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.
- 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 DSL also leads on mental health and wellbeing across the school.

## **Children who are Absent from Education**

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- Where possible, Steephill Independent School will hold more than one emergency contact number for each pupil/student, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern (see section 3.5).
- Where the school has concerns that a child has unexplainable and/or persistent absences and/or is missing from education, we will respond in line with our statutory duties (DfE: Children missing education).

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

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

## **Looked-After Children, Previously Looked-After Children, and Kinship Care**

Steephill School recognises its responsibility to safeguard and promote the welfare of **looked-after children (LAC), previously looked-after children (PLAC), and children in kinship care** who are under the care of a local authority.

## Identification and Records

- Steephill School will maintain an up-to-date register of pupils who are LAC, PLAC, or in kinship care.
- Relevant details about care arrangements, contact with social workers, and local authority involvement will be recorded confidentially.

## Cooperation with Local Authorities and Virtual School Heads (VSHs)

- Where a pupil is looked-after, previously looked-after, or in kinship care under a local authority, the school will cooperate with the **Virtual School Head (VSH)** and/or other local authority representatives.
- This includes:
  - Contributing to **Personal Education Plans (PEPs)**.
  - Sharing relevant information regarding the pupil's welfare, safeguarding, and educational progress.
  - Supporting interventions or additional support recommended by the local authority.

## Safeguarding and Pastoral Care

- Staff will be alert to the **heightened vulnerabilities** that these pupils may experience, including emotional, social, and academic challenges.
- Any safeguarding concerns will be reported immediately to the **Designated Safeguarding Lead (DSL)** and, where appropriate, to the local authority and VSH.
- Steephill School will ensure that pupils have consistent access to pastoral care and academic support, in line with their individual needs.

## Carer and Family Engagement

- Steephill School will maintain regular communication with carers, guardians, or parents, ensuring they are informed and involved in safeguarding and educational decisions.

## Accountability

The **DSL** is responsible for ensuring that all procedures regarding looked-after, previously looked-after, and kinship care pupils are implemented effectively, and that cooperation with local authorities and VSHs is maintained when required.

## **Alternative provision**

The school recognises its continued safeguarding responsibility for any pupil placed in an alternative provision (AP) setting, whether on a full-time or part-time basis. Alternative provision may include specialist education providers, colleges, tuition centres, or other commissioned services.

## **Responsibilities and Safeguarding Expectations**

- **Commissioning and Placement:**
  - Before placing a pupil with an AP provider, the Steephill School will obtain written confirmation that the provider has completed all required safeguarding checks on staff, including DBS (Disclosure and Barring Service) checks, and adheres to safer recruitment practices.
  - Steephill School will ensure that the AP provider has appropriate safeguarding policies and procedures in place, consistent with statutory guidance, and that staff are trained in safeguarding, online safety, and child protection.
- **Ongoing Oversight:**
  - Steephill School will monitor the placement to ensure it meets the pupil's educational, social, and emotional needs.
  - Regular communication between Steephill School, the pupil, parents/carers, and the AP provider will be maintained to promptly identify and respond to any safeguarding concerns.
- **Understanding Vulnerabilities:**
  - Staff responsible for commissioning or managing AP placements will be aware that pupils accessing alternative provision often have complex needs or heightened vulnerability.
  - Extra vigilance will be exercised regarding potential risks, including neglect, exploitation, online harms, and mental health concerns.
- **Early Intervention:**
  - Any safeguarding concerns arising from a pupil's placement in AP will be addressed immediately, following the Steephill School's safeguarding and child protection procedures.
  - Steephill School will take responsibility for coordinating multi-agency support where needed to ensure the pupil's welfare and safety.

## **Accountability**

The Designated Safeguarding Lead (DSL) will ensure that all AP placements are subject to rigorous safeguarding oversight, maintain records of checks and communications, and review the suitability of placements regularly.

## **Children who may benefit from Early Help**

Steephill School follows the statutory definition of “safeguarding and promoting the welfare of children” as set out in *Working Together to Safeguard Children (2023)*.

Safeguarding and promoting the welfare of children is defined 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.

Safeguarding is not just about responding to harm once it has occurred but includes proactive measures to reduce risks, build resilience, and intervene at the earliest possible stage.

The school recognises that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a concern emerges, at any point in a child’s life, from the foundation years through to the teenage years.

Staff are expected to:

- Identify children and families who may benefit from early help.
- Discuss concerns promptly with the Designated Safeguarding Lead (DSL).
- Work with the DSL to decide whether early help is appropriate, whether a referral to children’s social care is required, or whether support should be provided internally.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.
- Where it is identified a child may need early help, staff and DSLs will respond in line with the appropriate section of this policy.

Where early help is appropriate, the DSL will:

- Lead and coordinate a plan of support, working with the child, family, and relevant professionals.
- Monitor the impact of support and escalate concerns if the child's situation does not improve or is considered to be deteriorating.
- Ensure the school contributes fully to multi-agency early help assessments and support plans.

### **Responsibility**

All staff have a duty to be vigilant in recognising emerging needs and potential risks. The **DSL** has overall responsibility for ensuring that early help pathways are understood, implemented, and reviewed in line with local safeguarding partnership arrangements and statutory guidance.

## Children who need a Social Worker

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform the school 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

- Steeplehill Independent School recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and a previously looked after child also potentially remains vulnerable.
- The school has appointed a designated teacher (see Children in Care policy) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the school believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

## LGBT pupils/students

- The fact that a pupil/student may be LGBT is not in itself an inherent risk factor for harm, however, staff will be aware that LGBT pupils/students can be targeted by other individuals. Staff will also be aware that in some cases a pupil/student who is perceived by others to be LGBT (whether they are or not) can be just as vulnerable as pupils/students who identify as LGBT.
- When supporting a trans or gender questioning child, the school will consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Staff will also be aware that the risks to these pupils/students can be compounded when they do not have a trusted adult with whom they can speak openly.

- Staff will endeavour to reduce the additional barriers faced by these pupils/students and provide a safe place for them to speak out and share any concerns they have.

### **24. Children who are Privately Fostered**

- Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of the school, we must notify Kent Integrated Children's Services in line with the local KSCMP arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

## 25. Online Safety

### Expanded Online Safety Risks

In line with current statutory guidance, including *Keeping Children Safe in Education (KCSIE)*, the school recognises that online safety risks continue to evolve. In addition to the established categories of risk (content, contact, and conduct), we now explicitly include **content risks** linked to disinformation, misinformation, and conspiracy theories.

These risks can:

- Expose children to inaccurate, harmful, or misleading information.
- Undermine trust in reliable sources and authorities.
- Influence children's understanding of world events, relationships, or health and wellbeing.
- Lead to increased vulnerability to exploitation, radicalisation, or harmful decision-making.
- Steephill Independent School will ensure that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Steephill Independent School 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.

### Our approach

- **Curriculum:** Online safety education, delivered through Computing, PSHE, and across the wider curriculum, will include age-appropriate teaching on identifying reliable sources, fact-checking, critical thinking, and digital resilience.
- **Staff Training:** All staff will be trained to recognise the signs that a pupil may have been exposed to harmful misinformation, disinformation, or conspiracy theories and will know how to respond in line with safeguarding procedures.
- **Parental Engagement:** Parents/carers will be provided with guidance and resources to help them support their child's safe and critical use of online content at home.
- **Pupil Voice:** Children will be encouraged to speak openly about what they see or hear online, including content they find confusing, upsetting, or contradictory.

- **Safeguarding Response:** Any concerns that a pupil has been adversely affected by harmful or misleading online content will be treated as a safeguarding matter and managed in accordance with the school's safeguarding procedures.

To this end, a range of policies are in place relating to online safety and the use of technology and systems. These main relevant policies which should be considered include:

- Online Safety Policy;
- Information Security Policy;
- In addition, the School also maintains an Acceptable Use Agreement (AUA) for pupils/students and publishes a number of Privacy Notices.

### **Acceptable use of Generative Artificial Intelligence (AI)**

We recognise the growing use of generative AI tools (e.g. chatbots, image generators, and automated content creation tools) in education and beyond. While these technologies can provide opportunities for learning, creativity, and efficiency, they also present safeguarding, ethical, and data-protection risks that must be carefully managed. This is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.

### **Risks of Generative AI**

Generative AI tools may:

- Produce inaccurate, biased, or misleading information that appears credible.
- Generate harmful or inappropriate content if prompts are misused.
- Involve the sharing of personal or sensitive data, raising privacy concerns.
- Contribute to issues of plagiarism, academic dishonesty, or lack of digital integrity.
- Amplify risks linked to misinformation, disinformation, and online manipulation.

### **School Approach**

Curriculum: Staff and pupils will be taught, at an age-appropriate level, about how generative AI works, its benefits, and its risks both in lessons and staff training. This

includes the importance of critical thinking, verifying AI outputs, and recognising that not all generated content is reliable or appropriate.

Staff Training: Staff will receive guidance and training on the safe, ethical, and educational use of generative AI. This includes clear protocols on when and how these tools may be used with pupils. [Generative artificial intelligence \(AI\) in education - GOV.UK](#)

- Steephill Independent School will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying and behaviour and the staff handbook.
- Where the school believes that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the school will respond in line with the UKCIS guidance ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’ and the local KSCMP guidance.

### **Use in School:**

Generative AI will only be used under staff supervision for specific, curriculum-related purposes.

Staff and pupils will not be permitted to enter personal data into generative AI systems.

AI-generated content will not replace teacher-led planning, assessment, or decision-making.

Safeguarding Response: Any misuse of generative AI by staff or pupils, including attempts to access harmful content or use tools dishonestly, will be addressed in line with the school’s safeguarding and behaviour policies for pupils and the staff handbook.

Parental Engagement: Parents will be provided with information about generative AI, its risks, and how to support children in using such tools responsibly at home.

The Designated Safeguarding Lead (DSL), in partnership with the Computing/Online Safety Lead, will ensure that the school’s use of generative AI is in line with current legislation, DfE guidance, NSPCC recommendations, and best practice in safeguarding.

### **Planning Technology to Support Safeguarding and Online Safety**

We recognise that technology planning is an essential part of safeguarding, online safety, and the prevention of cyber incidents. All digital systems, devices, and platforms will be assessed and implemented with the welfare of pupils in mind.

## **Planning and Assessment**

We will use the “Plan technology for your school” self-assessment tool (as referenced in paragraph 142 of national guidance) to:

- Review existing IT systems and digital infrastructure.
- Identify potential risks to pupils and staff, including cybersecurity threats and online safety vulnerabilities.
- Ensure technology aligns with safeguarding policies, procedures, and legal obligations.
- The assessment will cover areas such as network security, device management, access controls, monitoring tools, and online safety features.

## **Roles and Responsibilities**

- Leadership Team: The senior leadership team will oversee the strategic use of technology and ensure that safeguarding is embedded in all digital planning decisions.
- IT/Technical Staff: Responsible for implementing recommendations from the self-assessment tool, maintaining secure systems, and monitoring digital safety measures.
- Designated Safeguarding Lead (DSL): Will work closely with IT and leadership teams to ensure that technology planning supports safeguarding and online safety goals.

## **Review and Improvement**

- Technology planning and assessments will be conducted regularly (at least annually) or whenever significant changes to the digital environment occur.
- Outcomes of the self-assessment will inform:
  - Updates to the Online Safety Policy.
  - Staff training and pupil education on safe technology use.
  - Incident response and safeguarding procedures relating to digital systems.
- By embedding technology planning into safeguarding procedures, the school ensures a proactive approach to online safety, cyber incident prevention, and the responsible use of digital tools.

## **Resources:**

“Plan technology for your school” self-assessment tool – GOV.UK / Safeguarding Network.

[Plan technology for your school - GOV.UK](#)

## **Responsibility**

The Designated Safeguarding Lead (DSL) will ensure that the school's online safety provision remains up to date and reflects emerging risks and national guidance. The DSL will also coordinate with curriculum leads and the school's online safety coordinator to ensure staff, pupils, and parents are informed and supported.

## **26. Staff Engagement and Boundary Expectations**

We recognise that maintaining **clear and professional boundaries** between staff and pupils is a fundamental safeguarding requirement. This includes interactions both **in and out school and online**, where blurred or inappropriate boundaries can increase risks of grooming, abuse, or exploitation.

### **Code of Conduct**

All staff must adhere to the school's Staff Code of Conduct, which sets out clear expectations for professional behaviour, including online and offline communication with pupils.

#### **Staff are not permitted to:**

- Communicate with pupils via personal devices, email, or social media.
- Develop personal or exclusive relationships with pupils that go beyond professional boundaries.
- Accept or extend "friend" or "follow" requests on personal social media accounts.
- Any online learning platforms, digital communication, or messaging must use school-approved systems and comply with safeguarding and data protection requirements.

#### **Recognising Boundary Concerns**

- Staff will receive training to help identify early "red flags" in professional boundaries, such as:
  - Favouritism or special treatment of individual pupils.
  - Regular one-to-one contact outside normal working practices.
  - Over-familiar or personal language in communications.

#### **Secrecy around interactions with pupils.**

Concerns about boundary violations, whether by colleagues, volunteers, visitors, or external providers must be reported immediately to the Designated Safeguarding Lead (DSL) in line with the school's safeguarding and whistleblowing procedures.

### **Online Boundaries**

- Staff must maintain the same professional standards in digital spaces as they do face-to-face.
- Online communication should always be transparent, recorded where possible, and subject to oversight.
- Any concerns about a pupil's attempt to breach staff boundaries online (e.g. sending personal messages, inappropriate contact, or connecting on social media) must be reported promptly.

### **Accountability**

- The DSL and senior leadership team are responsible for monitoring adherence to staff boundary expectations, ensuring that all staff receive regular safeguarding training, and addressing any breaches swiftly and appropriately.
- By reinforcing clear staff boundaries and ensuring staff are trained to recognise and report inappropriate behaviours, the school strengthens its safeguarding culture and protects both pupils and staff.

### **Awareness, Induction and Training**

- All members of staff are required to read and sign a statement to show that they have understood part one or annex A of the current version of 'Keeping Children Safe in Education' which covers essential safeguarding information for staff.
- School leaders, including the DSL and governors will read KCSIE in its entirety.
- School leaders and all members of staff who work directly with children will read annex B.
- It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff, volunteers and Governors are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are

aware of the school internal safeguarding processes, as part of their induction. This training is regularly updated.

- All staff, volunteers and Governors (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns.
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff, volunteers and Governors will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Steephill School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape the school safeguarding arrangements and child protection policies.

- All governors receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured 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.

### **Safer Working Practice**

The school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school Positive Behaviour Policy.
- The DSL will ensure that all staff (including contractors) and volunteers (including agency and third-party staff) are aware of the expectations regarding safe and

professional practice via the staff Behaviour Policy, Code of Conduct and Acceptable Use Policy.

- 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 interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff Code of Conduct, Acceptable Use Policies, and Social Media.

#### Supervision and Support

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

## 27. Safer Recruitment and Allegations

### Safer Recruitment and Safeguarding Checks

- Steepphill Independent School is 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.
- Steepphill Independent School will follow relevant guidance in Keeping Children Safe in Education (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS);
- The Governing Body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance;
- The Governing Body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
  
- Steepphill Independent School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
  
- We advise all staff, volunteers and Governors to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
  
- Where the 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.
  
- Where the school organises work experience placements, we will follow the advice and guidance as identified in Part Three of KCSIE.

Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors (also see Appendix 5). The school will respond to allegations in line with the Kent LADO Education Safeguarding Advisory Service (LESAS) which could

include discussions as necessary with the Local Authority Designated Officer (LADO) and Part Four of KCSIE. In depth information can be found within our ‘Statement of Procedures for dealing with Allegations against Staff’ and Staff Code of Conduct policy.

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part Four of KCSIE and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where Head Teacher is unsure how to respond, for example if the school is unsure if a concern meets the harm ‘thresholds’, advice will be sought via the LADO Education Safeguarding Advisory Service (LESAS).
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Head Teacher (and if they have been involved, the LADO) will consider the facts and determine whether any lessons can be learned and any improvements can be made.
- In a situation where the school receives an allegation relating to an incident that happened when an individual or an organisation was using the school’s premises for the purposes of running activities for children (for example, community groups, sports associations or service providers that run extracurricular activities), the school will follow their safeguarding procedures and policies, including informing the LADO.

#### Concerns that meet the ‘harm threshold’

- Steephill Independent School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
  - behaved in a way that has harmed a child, or may have harmed a child 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 referred immediately to the Head Teacher who will contact LESAS 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 Head Teacher, staff are advised that allegations should be reported to the Chair of Governors who will contact LESAS.

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

- Steephill Independent School may also need to take action in response to ‘low-level’ concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the school, the Head Teacher will share or liaise with LESAS.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example, consulting with LESAS and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our staff Code of Conduct – this includes what a low-level concern is and the importance of sharing them.

#### Safe Culture

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff Code of Conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Steephill Independent School takes all concerns or allegations received seriously.

- All members of staff are made aware of the Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Steephill Independent 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 school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from LESAS.

## **28. 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 guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on the school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## **29. Use of School Premises by Other Organisations**

- Where services or activities are provided separately by another body using the school premises, the Head Teacher and Governing Body will seek written assurance that the organisation concerned has appropriate policies and procedures in place

with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

- If this assurance is not achieved, then an application to use premises will be refused.

### **30. Opportunities to teach safeguarding**

- Steephill Independent School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and Health Education.
- We recognise that school plays 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.
- Steephill Independent School recognises that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse, neglect or exploitation, and some SEND children might be needed.
- Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

### **31. 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 Behaviour Policy.

## The Use of Premises by Other Organisations

- Where the school facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extracurricular activities) we will ensure that appropriate arrangements are in place to keep children safe.
  - Where those services or activities are provided under the direct supervision or management of the school staff, our existing arrangements for child protection, including this policy, will apply.
  - Where services or activities are provided separately by another body using the school facilities/premises, the Head Teacher and Governing Body will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.
  
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

### **32. Local Support**

- All members of staff at Steephill Independent School are made aware of local support available.
- Kent Integrated Children's Services/ Children's Social Work Services:
  - Childrens Portal ([kent.gov.uk](http://kent.gov.uk))
  - Front Door Service: 03000 411111
  - Out of Hours Number: 03000 419191
- Local Early Help and Preventative Services and Family Hubs
- Kent Police- 101 or 999 if there is an immediate risk of harm
  
- Kent Safeguarding Children Multi-Agency Partnership (KSCMP)- [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)- 03000 421126
- Adult Safeguarding
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email: [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)
- LADO Education Safeguarding Advisory Service (LESAS)

- If schools/settings have concerns relating to the welfare of a child(ren), they should contact the Front Door Service via the Kent Integrated Children's Services Portal
- To make a referral to the LADO regarding an allegation against a member of staff, please complete a LADO referral via the Kent Integrated Children's Services Portal
- If schools/settings need clarification on whether to make a LADO referral, need general/strategic education safeguarding or online safety advice (not specific to individual children), or would like to enquire about safeguarding reviews, training or other related products, please use the LESAS enquiry form
- If a call is urgent, i.e. a child is in immediate danger and requires safeguarding, call 03000 41 11 11
- If a call is urgent and outside office hours, call 03000 41 91 91

### **33. National Support**

#### Support for staff

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

#### Support for learners

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

#### Support for adults

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

## Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

## Domestic Abuse

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

## Honour-based Abuse

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation, procedural information:  
[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- Contextual Safeguarding, Child on Child Abuse, Sexual Exploitation and Criminal Exploitation: o Contextual Safeguarding Network:  
<https://contextualsafeguarding.org.uk>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Substance Misuse

- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-youngpeople/](http://www.wearewithyou.org.uk/services/kent-for-youngpeople/)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)
- Mental Health o Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-youngpeople/](http://www.wearewithyou.org.uk/services/kent-for-youngpeople/)

#### Online Safety

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org.uk](http://www.internetmatters.org.uk)
- NSPCC/Net Aware: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)

#### Radicalisation and Hate

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

### **Appendix 1 – Categories of Abuse**

All staff should be aware that abuse, neglect, exploitation and other 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 which involves inflicting harm, or failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate off line abuse. Children may be abused by one or multiple adults or other children.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside the school, inside and outside home and online. All staff will be aware that abuse, neglect and other 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. All staff, especially the DSLs and Deputy DSLs will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside these environments. This includes being aware that pupils/students can be at risk of abuse or exploitation in situations outside their families (extra familial harms). All staff will be aware of the appropriate action to take following a pupil/student being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyber-bullying and the sharing of indecent images.

All staff should read and understand part one of 'Keeping Children Safe In Education' and staff who have direct contact with pupils/students should also read annex A. Staff will confirm they have read the guidance at the beginning of each academic year.

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 or attempts at suicide;
- Alluding to secrets which they cannot reveal;
- Tendency to cling or need constant reassurance;
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby;
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger;
- Unexplained gifts or money;
- Depression and withdrawal;
- Fear of undressing for PE;
- Sexually transmitted disease;
- Fire setting.

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

## Signs that MAY INDICATE physical abuse

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

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

Signs that MAY INDICATE emotional abuse

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

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

## Signs that MAY INDICATE neglect

- Constant hunger;
- Poor personal hygiene;
- Constant tiredness;
- Inadequate clothing;
- Frequent lateness or non-attendance 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 has been 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 e.g. "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 e.g. "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 only as far as is necessary for you to establish whether or not 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
- KSCB: [www.kscb.org.uk](http://www.kscb.org.uk)

## 6. Relax

- Get some support for yourself. Dealing with disclosures can be traumatic for professionals.

## **APPENDIX 3 – Enforced School Closure**

During any school closure, with arrangements in place for a virtual school, we will adhere to the Safeguarding and Child Protection Policy. Please note the following key arrangements in place during school closure:

- An online platform (CPOMs) is used for staff to report any safeguarding concerns. The DSL and Deputy DSL have access to this from home and can respond to any safeguarding concerns as they are raised. Should both members of staff become ill at this time of closure, there is an additional Safeguarding Officer to ensure appropriate actions have been taken.
- Up to date contact information will be shared with parents/carers during school closures.

- Staff will continue to look after the wellbeing and safety of our students through virtual school activities, whereby they are following the normal daily timetable, are in regular contact with students and colleagues and will raise any concerns regarding wellbeing and attendance via the appropriate channels.
- Students considered to be particularly vulnerable will be supported with more regular personalised contact from pastoral staff, SENCOs and welfare leads.
- School provision will be put in place for children of Key Worker parents/carers and vulnerable students when appropriate. Staff at the provision will have had safeguarding training and will share any concerns with the DSL or Deputy DSL as necessary.
- All forms of abuse are a priority and any new cases will be dealt with in liaison with the appropriate external agencies by the DSL or Deputy DSL.
- Parents/Carers have been reminded to pay particular attention to their child's online safety at a time of increased use of social media and other online platforms. Security measures are in place across all school software monitoring student use and any concerns will be flagged to the DSL or Deputy DSL for ongoing action as necessary.
- School staff will continue to adhere to 'whistle blowing' procedures should they become concerned about the safety of a colleague working within school.

#### **APPENDIX 4 – Specific Safeguarding Issues**

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Annex B.

Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. If you wish to cover these in the policy, consider including:

- An explanation of what the issue is and how your school approaches it (e.g. any preventative measures in place, training you provide for staff);
- What staff should be aware of and actions they should take;

- How your school works with external agencies, where relevant.

You should also ensure your policy reflects any locally agreed procedures put in place by the 3 safeguarding partners.

### **Children missing from education**

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

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

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

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

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

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

## **Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

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

## **Child sexual exploitation**

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

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

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

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

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

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

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

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

For the purposes of this policy, "child abduction" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils. Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

### **Cyber-crime**

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that

can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

### **Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

The DSL will provide support according to the child’s needs and update records about their circumstances.

### **Homelessness**

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

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

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

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

## **FGM**

For the purposes of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with Children's Services and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve Children's Services as appropriate.

NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “‘honour-based’ abuse (HBA)”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

### **Forced marriage**

Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place;
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk)

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

### **Modern slavery**

For the purposes of this policy, “modern slavery” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

### **Preventing radicalisation**

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Terrorism is an action that:
  - Endangers or causes serious violence to a person/people; ○ Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system
  - The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves;
- Becoming susceptible to conspiracy theories and feelings of persecution;
- Changes in friendship groups and appearance;
- Rejecting activities they used to enjoy;
- Converting to a new religion;
- Isolating themselves from family and friends;
- Talking as if from a scripted speech;
- An unwillingness or inability to discuss their views;
- A sudden disrespectful attitude towards others;
- Increased levels of anger;
- Increased secretiveness, especially around internet use;
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- Accessing extremist material online, including on Facebook or Twitter;
- Possessing extremist literature;
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

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

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our positive behaviour policy and online safety policy.

### **Child on child abuse**

This is when children abuse other children. This type of abuse can take place inside and outside school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

## Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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

Staff should be aware of the importance of:

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

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

### **Virginity testing and hymenoplasty**

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

### **Serious violence**

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

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

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

- Being male;
- Having been frequently absent or permanently excluded from school;
- Having experienced child maltreatment;
- Having been involved in offending, such as theft or robbery.

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

### **Pupils/students with family members in prison**

Pupils/students with a family member in prison will be offered pastoral support as necessary. They will receive a copy of relevant materials and, where appropriate, will be allowed the opportunity to discuss questions and concerns.

### **Pupils/students required to give evidence in court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support and materials.

### **Mental health**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil/student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils/students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils'/students' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils/students in need of additional mental health support, including working with external agencies.

### **Kent and Medway Gang Strategy**

This strategy is the first multi-agency commitment to tackle gangs operating across Kent and Medway, and to support those affected by gangs and gang-related crime.

Vulnerable children and young people at risk of criminal exploitation by gangs are also at risk of a whole range of aligned abuse as a result of gang affiliation – from emotional and psychological maltreatment to sexual abuse and debt bondage. They may also be in situations which result in the neglect of their basic needs, live in an unsafe environment, have poor attendance and correspondingly poor long-term outcomes.

For full details please see this link:

[https://www.kscb.org.uk/\\_data/assets/pdf\\_file/0005/81455/Final-Version-Kent-and-Medway-GangsStrategy.pdf](https://www.kscb.org.uk/_data/assets/pdf_file/0005/81455/Final-Version-Kent-and-Medway-GangsStrategy.pdf)

## **Gangs, County Lines, Serious Violence, Crime and Exploitation**

Steephill Independent School recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegations seriously and work in ways that support children and keep them safe.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs;
- 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; Change in friendships/relationships with others/groups;
- Children who associate with other young people involved in exploitation; Children who suffer from changes in emotional wellbeing; o Significant decline in performance; Signs of self-harm/significant change in wellbeing; Signs of assault/unexplained injuries.

## **Upskirting**

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

## **Checking the identity and suitability of visitors**

- All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit;

- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification;
- Visitors are expected to sign the visitors' book and wear a visitor's badge;
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID.
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will: communicate immediately with senior staff. There will be a co-ordinated search of the school grounds using walkie talkies to communicate. Assuming the child is found, we would ensure that the relevant member of staff contacts parents. The child will be returned to their class as long as they are calm and ready to learn. If the child is not located on the school grounds and we had good grounds to suspect that they had absconded, we would call the parents to see if they had made their way home and call the police for a search of the area.

## **APPENDIX 5: Safer Recruitment and DBS Checks – Policy and Procedures**

### **Recruitment and selection process**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and

selection process to ensure we are committed to safeguarding and promoting the welfare of children.

## **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children;
- That safeguarding checks will be undertaken;
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children;
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

## **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity);
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

## **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them;
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history;

- Whether they are included on the barred list;
- Whether they are prohibited from teaching;
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales;
- Any relevant overseas information.
- Sign a declaration confirming the information they have provided is true

### **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references;
- Liaise directly with referees and verify any information contained within references with the referees;
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Head Teacher/principal as accurate in respect to disciplinary investigations;
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate;
- Resolve any concerns before any appointment is confirmed.

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this;

- Explore any potential areas of concern to determine the candidate's suitability to work with children;
- Record all information considered and decisions made.

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity;
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken;
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;
- Verify their mental and physical fitness to carry out their work responsibilities;
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- Verify their professional qualifications, as appropriate;
- Ensure they are not subject to a prohibition order if they are employed to be a teacher;
- Carry out further additional checks, as appropriate, on candidates who have lived or worked; outside of the UK. Where available, these will include:
  - For all staff, volunteers and Governors, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

\* Management positions are most likely to include, but are not limited to, Head Teachers, principals and deputy/assistant Head Teachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more;
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
  - We believe the individual has engaged in relevant conduct; or
  - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
  - We believe the 'harm test' is

satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity;
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Schools with pupils aged under 8 add: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of

the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment;
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state.

All governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008);
- Identity;
- Right to work in the UK;
- Other checks deemed necessary if they have lived or worked outside the UK

## **APPENDIX 6: Allegations of Abuse made against Staff**

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 – this includes behaviour taking place both inside and outside of school.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A ‘case manager’ will lead any investigation. This will be the Head Teacher, or the chair of governors where the Head Teacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;

If in doubt, the case manager will seek views from the school’s HR adviser as well as the police, LADO and children’s social care where they have been involved.

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation;

- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence);
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below;
- Discuss the allegation. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought;
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care;

- If immediate suspension is considered necessary, agree and record the rationale for this. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details;
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;
- If it is decided that further action is needed, take steps to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate;
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member);
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their

statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LESAS to determine a suitable outcome;
- The Governing Board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation;
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required;
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Specific actions**

Action following a criminal investigation or prosecution

The case manager will discuss with HR whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services,

the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

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

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate;

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate;
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LESAS, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation;
- How to manage press interest if, and when, it arises.

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- Notes of any action taken, decisions reached and the outcome;
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious;
- Include substantiated allegations, provided that the information is factual and does not include opinions.

### **Learning lessons**

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff;
- The duration of the suspension;
- Whether or not the suspension was justified ;
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

### **Section 2: concerns that do not meet the harm threshold**

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above. Concerns may arise through, for example:

- Suspicion;
- Complaint;
- Disclosure made by a child, parent or other adult within or outside the school;
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term ‘low-level’ concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- Using inappropriate sexualised, intimidating or offensive language.

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- Empowering staff to share any low-level concerns;
- Empowering staff to self-refer;

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised;
- Helping to identify any weakness in the school's safeguarding system.

### **Responding to low-level concerns**

If the concern is raised via a third party, the Head Teacher will collect evidence where necessary by speaking:

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

The Head Teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR;
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority;
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.