



# **Safeguarding Policy**

**(Adapted from the KCC Policy written by the Education Safeguarding Team)**

## **Key Contact Personnel**

Coppice Primary Partnership Designated Safeguarding Lead: **Mark Chatley** (Trust Leader)

### **Coxheath Primary School**

- Designated Safeguarding Lead: **Bev Evenden** (Deputy Headteacher)
- Deputy Designated Safeguarding Lead(s): Giacomo Mazza (Headteacher)  
Liz Webber (Assistant Headteacher)  
Abi Cheeseman (Family Liaison Officer)  
Rebecca Knight (Assistant Headteacher)  
Darren Flisher (Assistant Headteacher)  
Clare Nursey
- Named Safeguarding Governor/s:

### **Loose Primary School**

- Designated Safeguarding Lead: **Sean Johnson** (Deputy Headteacher)
- Deputy Designated Safeguarding Lead(s): Chris Hogwood (Assistant Headteacher)  
Ingrid Dutch (Families & Community Manager)  
Jessica Burman (Assistant Headteacher)  
Jennifer Stanley (Family Liaison Assistant)  
Ben Farley (Assistant Headteacher)  
Richard Benjamin
- Named Safeguarding Governor/s:

### **St Katherine's School & Nursery**

- Designated Safeguarding Lead: **Sarah Aikenhead** (Deputy Headteacher)
- Deputy Designated Safeguarding Lead(s): Ray Lang (Headteacher)  
Dominic Twedde (Assistant Headteacher)  
Caroline Loveland (SENCo)  
Vicky Abbott (FLO)  
Laura Payne
- Named Safeguarding Governor/s:

**This is a core policy that forms part of the induction for all staff. 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.**

Date written: September 2023

Date agreed and ratified by Trust: Term 1 2023/24

Date of next review: Term 1 2024/25

**This policy will be reviewed annually and/or following any updates to national and local guidance and procedures.**

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# What to do if you have a welfare concern in A Trust School

## Why are you concerned?

For example

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour

## Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the school procedure (record on MyConcern, speak to any DSL)

- Reassure the child
- Clarify concerns, using open questions if necessary (**TED**: Tell, Explain, Describe)
- Use child's own words and record facts, not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (name, role)

## Inform the Designated Safeguarding Lead ( See DSL posters at main entrance in each

- Consider whether a child is at immediate risk of harm; are they safe to go home?
- If a child is at risk of immediate harm, call the Integrated Front Door on 03000 411 111 (outside office hours - 03000 419 191) or the Police on 999 immediately
- Access the Kent Safeguarding Support Level Guidance document and procedures: [www.kscmp.org.uk](http://www.kscmp.org.uk)
- Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Police, or make a Request for Support via Integrated Children's Services: 03000 411 111
- If unsure, consult with Area Education Safeguarding Advisor (03000 423 158) or Local Authority Social Worker at the Front Door: [www.kscmp.org.uk](http://www.kscmp.org.uk)

## If you are unhappy with the response

### Staff:

- Follow local authority/safeguarding partnership escalation procedures
- Follow whistleblowing procedures

### Pupils or Parents:

- Follow school complaints procedures (see school and trust website for complaints policy)

## Record decision making and action taken in the pupil child protection file

## Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback, and how you will record

## Review and request further support if necessary

At all stages, the child's circumstances will be kept under review  
The DSL/staff will request further support if required to ensure the **child's safety is paramount**

## 1. Child Focused Approach to Safeguarding

### 1.1 Introduction

- Schools in Coppice Primary Partnership (CPP) recognise our 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) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- CPP believe that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at CPP schools will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend CPP schools but may also apply to other children connected to CPP, for example, siblings, or younger members of staff (under 18s) or children on student/work placements.
- CPP recognises the importance of providing an ethos and environment that will help children to be safe and to feel safe. In our trust children are respected and are 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 services to provide.
- CPP recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
  - **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - **Protection:** following the agreed procedures, ensuring all 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, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
  - **Collaboration:** with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2023.

### 1.2 Policy context

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

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
  - Keeping Children Safe in Education (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](#)
  - Early Years and Foundation Stage Framework (EYFS)
  - The Education Act 2002
  - Education and Inspections Act 2006
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - The Human Rights Act 1998
  - The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- CPP will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.
- CPP recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

### 1.3 Definition of safeguarding

- In line with 'Working Together to Safeguard Children' and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes 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(ren)
  - 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.
- The trust acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Child-on-child abuse
  - Children with family members in prison
  - Children who are absent or missing from education

- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- 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
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- ‘Upskirting’

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

#### **1.4 Related safeguarding policies**

- This policy is one of a series in the trust integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
  - Anti-bullying
  - Attendance
  - Behaviour, including behaviour management and use of physical intervention
  - Complaints
  - Confidentiality
  - Data protection and information sharing
  - Emergency procedures such as evacuations and lockdowns
  - Health and safety, including plans for school reopening
  - First aid and accidents, including medication and managing illness, allergies, health, and infection
  - Image use
  - Managing allegations against staff
  - Mobile and smart technology
  - Online safety
  - Personal and intimate care
  - Relationship, Sex and Health Education (RSHE)
  - Risk assessments, such as school trips, use of technology, school re-opening
  - Safer recruitment
  - Social media
  - Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
  - 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” - [Safer Recruitment Consortium](#)
  - “What to do if you are worried a child is being abused” – DfE, March 2015
  - Early Years Foundation Stage 2021 Welfare Requirements
- These documents can be found in / at: the staff shared drive and in the safeguarding folder in the staff room.

### **1.5 Policy compliance, monitoring and review**

- CPP will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE as appropriate. These can be found on MyConcern under resources and then Local Policies.
- Parents/carers can obtain a copy of the Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the trust and school websites
- The policy forms part of our trust development plan and will be reviewed annually by trust board (TB) who have responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and headteacher will ensure regular reporting on safeguarding activity and systems to the Local Governing Body (LGB) and the Trust Leader will report to the TB. The boards will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

## **2.Key Responsibilities**

### **2.1 Governance and leadership**

- The LGB, TB and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The LGB and TB have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The TB and Trust Leader (TL) will facilitate a trust wide approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The TB and LGB are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
  - This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - For further information about our approaches to equality, diversity, and inclusion, please access our website

- The TB and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the TB, are understood, and followed by all staff.
- The TB and TL will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The LGB and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The LGB 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, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

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

- The schools have appointed a member of the senior leadership team, as the Designated Safeguarding Lead (DSL). These can be seen on page 1 of this policy and on posters in the entrance of each school.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The schools have also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence. These names can also be seen on page 1 of the policy and on the posters in the entrance of the school.
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. This includes but is not limited to:
  - Acting as the central contact point for all staff to discuss any safeguarding concerns.
  - Maintaining a confidential recording system for safeguarding and child protection concerns.
  - Coordinating safeguarding action for individual children.
    - When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
  - Liaising with other agencies and professionals in line with KCSIE and WTSC.
  - Ensuring that locally established procedures as 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.
  - Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).
  - Managing and monitoring the school role in any multi-agency plan for a child.
  - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.



- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
  - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
  - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
  - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
  - Liaising with the headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

### 2.3 Members of staff

- Our 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 have a responsibility to:
  - provide a safe environment in which children can learn.
  - be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
  - know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
  - be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - be prepared to identify children who may benefit from early help.
  - understand the early help process and their role in it.
  - understand the school safeguarding policies and systems.
  - undertake regular and appropriate training which is 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 how to maintain an appropriate level of confidentiality.
  - reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Staff at CPP recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

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

## 2.4 Children and young people

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

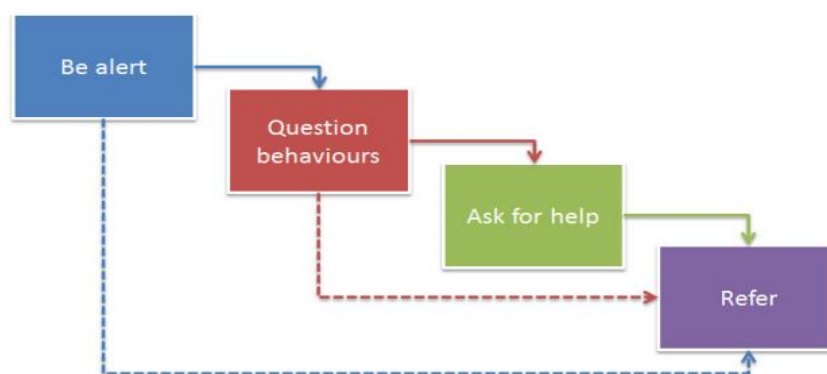
## 2.5 Parents and carers

- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant school policies and procedures.
  - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm, including online.
  - Seek help and support from the school or other agencies.

## 3. Child Protection Procedures

### 3.1 Recognising indicators of abuse and neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. This is outlined locally within the [Kent Support Levels Guidance](#).
- CPP recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:



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

- CPP recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- CPP recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- CPP recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- CPP recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child’s safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy which is informed by the DfE [‘Searching, screening and confiscation at school’](#) guidance.
  - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.

- Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

### 3.2 Responding to child protection concerns

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to child, reflecting back the concern.
  - use the child's language.
  - be non-judgmental.
  - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern using the facts as the child presents them, in line with trust record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 3). In these circumstances, any action taken will be shared with a DSL as soon as is possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- CPP 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: [www.kscmp.org.uk](http://www.kscmp.org.uk)
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found at: [www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services](http://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services)
- Where it is identified a child may benefit from Early Help support (as provided by [ICS](#)), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
  - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.
- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a

child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures.
  - CPP recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
  - The DSL may seek advice or guidance from an Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
  - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- 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 may request support with this via the Education Safeguarding Service.
- DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school 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. Where the school is unsure, advice will be sought from the Education Safeguarding Service.

### 3.3 Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school's safeguarding system – MyConcern - and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, a note of any action taken or not taken, how any decisions were reached and any outcomes.
- Concern forms are kept under the chronology of each child within the MyConcern system.
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records are kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-Ordinators (SENCOs), will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

### 3.4 Multi-agency working

- CPP recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- The school leadership team, LGB, TB, TL and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- CPP recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The school will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The headteacher and DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school behaviour policy which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

### 3.5 Confidentiality and information sharing

- CPP recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Where reasonably possible, the school will hold more than one emergency contact number for each pupil. 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.
- CPP has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our trust is compliant with all matters relating to confidentiality and information sharing requirements. The trust use the SchoolPro system to support with GDPR and act as DPO.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
  - KCSIE, the [Information Commissioner's Office](#) (ICO) and the DFE '[Information sharing advice for safeguarding practitioners](#)' guidance provides further details regarding information sharing principles and expectations.
- The headteacher and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy (see trust and school website). Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing, staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services . All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

### 3.6 Complaints

- All members of the school communities should feel able to raise or report any concerns about children's safety or potential failures in the school's safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on the school and trust websites.
- 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 in education 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 in the schools and in the trust will take all concerns reported to the school or trust 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 section 8 of this policy.

#### 4. Specific Safeguarding Issues

- CPP is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE which contains important additional information about the following specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

##### 4.1 Child-on-child abuse

- All members of staff at CPP recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.
- CPP recognises that child-on-child abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - Abuse in intimate personal relationships between children
  - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - Sexual violence and sexual harassment
  - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - Initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five).
- CPP adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.



- CPP recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, trust schools will
  - Have a robust anti bullying and behaviour policy
  - Provide appropriate and age appropriate PSHE and RSE curriculums
  - Ensure children have appropriate ways to report concerns
  - Ensure adults have appropriate ways to report concerns
- CPP 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 and/or trust policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils' and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
  - Carefully listening to the reports of the events with judgement or prejudice
  - Avoid labelling or blaming any party
  - Provide pastoral or nurture support
  - Work with parents to ensure they are aware of the process, situation and expectations
  - Provide appropriate education to support children
  - Following the relevant policies
  - Seeking external support where appropriate

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

- When responding to concerns relating to child-on-child sexual violence or harassment, CPP will follow the guidance outlined in Part five of KCSIE.
- CPP recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' CPP 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, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- CPP 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 that avoids alarming or distressing them.

- CPP recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
  - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support, for example [KSCMP](#) procedures and support from the Education Safeguarding Service.
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them.
  - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
  - the wishes of the victim in terms of how they want to proceed.
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
  - the ages of the children involved.
  - the developmental stages of the children involved.
  - any power imbalance between the children.
  - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - understanding intra familial harms and any necessary support for siblings following incidents.
  - whether there are any ongoing risks to the victim, other children, adult students, or school staff.
  - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

#### **4.3 Nude and/or semi-nude image sharing by children**

- CPP 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 to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  - not to delete the imagery or ask the child to delete it.
  - to avoid saying or doing anything to blame or shame any children involved.
  - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
  - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
  - to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
  - Parents/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 thirteen, 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.

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

- CPP recognises that both 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.
- CPP recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls

who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

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

#### **4.5 Serious violence**

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

#### **4.6 Modern Slavery**

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

#### **4.7 So-called Honour Based Abuse (HBA)**

- 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 will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- 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: 020 7008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)

- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting 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](#), however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how 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 a deputy), and Kent Integrated Childrens Services should be informed as appropriate.

#### 4.8 Preventing radicalisation

- CPP recognises that children are vulnerable to extremist ideology and radicalisation. [CPP](#) 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.
- All staff have received appropriate training to enable them to be alert to changes in children’s behaviour which could indicate that they may need help or protection from radicalisation.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.

#### 4.9 Cybercrime

- CPP recognises that children with particular skills and interests 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 or a deputy 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 the child protection policy and other appropriate policies.

#### 4.10 Domestic abuse

- CPP 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, socio-economic 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.
  - All trust schools are [Operation Encompass Schools](#). This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
    - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and 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 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 will 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.

#### 4.11 Mental health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

### 5. Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children should be protected, CPP acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups

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

- CPP acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- CPP 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 supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our schools will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.
- Our schools have robust intimate/personal care policies which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems. Further information can be found in our policies on the trust and school websites

### **5.2 Children requiring mental health support**

- CPP has an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where there are concerns regarding possible mental health problems for pupils, staff should:
  - Speak to a DSL
  - Seek advice from pastoral leads
  - Ensure SLT in school are aware
- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience through the schools' PSHE curriculum, including RSE.

### **5.3 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, the schools will hold more than one emergency contact number for each pupil so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern (see section 3.5).
- Where the school/college have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

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

- Where a parent/carers 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.

#### **5.5 Children who need a social worker (child in need and child protection plans)**

- The DSL will hold details of social workers working with children in the schools 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 school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

#### **5.6 Looked after children, previously looked after children and care leavers**

- CPP recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- Each school in the trust have appointed a '[designated teacher](#)' who works with local authorities, including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated 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 schools believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.



## 5.7 Children who are Lesbian, Gay, Bi, or Trans (LGBT)

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, CPP recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- CPP recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our RSE curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

## 5.8 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, they 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.

## 6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. CPP will adopt a whole Trust wide approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- CPP will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- CPP identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- CPP recognises that technology and the risks and harms related to it evolve and change rapidly. The trust will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.

- The headteacher will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body. The trust leader will also be informed.

### **6.1 Policies and procedures**

- The DSL has overall responsibility for online safety within the schools but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our behaviour policy and anti-bullying policy.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- CPP uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet and email systems.
  - All school/trust owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- CPP recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities. In accordance with KCSIE and EYFS :
  - CPP has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found in the staff handbook.

### **6.2 Appropriate filtering and monitoring on school/college devices and networks**

- CPP will do all we reasonably can to limit children's exposure to online harms through school/trust provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.
- When implementing appropriate filtering and monitoring, CPP will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our pupils; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
  - Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
  - Internet use will be supervised by staff as appropriate to pupils age, ability and potential risk of harm. The schools will decide on the appropriate level of supervision for individuals and groups of children and ensure that this is shared with all relevant staff.

## Responsibilities

- Our Trustees have overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Each school has a named DSL and named governor (see front page of this policy) who is responsible for ensuring that their school has met the DfE [Filtering and monitoring standards](#) for schools and colleges.
- The Trust Leader will provide oversight of and advise on adherence to the filtering and monitoring standards for schools.
- The school senior leadership team are responsible for
  - procuring filtering and monitoring systems.
  - documenting decisions on what is blocked or allowed and why.
  - reviewing the effectiveness of our provision.
  - overseeing reports.
  - ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
  - ensuring the DSL and ATS have sufficient time and support to manage their filtering and monitoring responsibilities.
- The DSL has lead responsibility for overseeing and acting on:
  - any filtering and monitoring reports.
  - any child protection or safeguarding concerns identified.
  - checks to filtering and monitoring system.
- ATS (working with relevant partners) have technical responsibility for:
  - maintaining filtering and monitoring systems.
  - providing filtering and monitoring reports.
  - completing technical actions identified following any concerns or checks to systems.
  - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.
- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

### Decision making and reviewing our filtering and monitoring provision

- When procuring and/or making decisions about our filtering and monitoring provision, the school senior leadership team works closely with the DSL and ATS. Decisions have been recorded and informed by an approach which ensures our systems meet our school and trust specific needs and circumstances, including but not limited to our pupil risk profile and specific technology use.
- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our trust undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.
- In addition, our school undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the Trust Leader, LGBs and Trust Board that we are meeting our safeguarding obligations.

### Appropriate filtering

- CPP's education broadband connectivity is provided through LGFL and CPP uses Webscreen/School Protect
  - LGFL is a member of [Internet Watch Foundation](#) (IWF).
  - Webscreen/School Protect has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
  - Webscreen/School Protect is blocking access to illegal content including child sexual abuse material (CSAM).
  - Webscreen/School Protect blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes but is not limited to content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- We filter internet use on all school/trust owned, or provided, internet enabled devices and networks. This is achieved by:
  - Strong network based filtering which is applied to any device using the school/trust WiFi
  - Review of categories and groups that have been blocked.
  - Alerts to relevant staff when attempts are made to access blocked content.
- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school/trust owned devices and networks, and all devices using the school/trust broadband connection.
- We work with LGFL and ATS to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:

- Turn off monitor/screen and report the concern immediate to a member of staff.
  - The member of staff will report the concern (including the URL of the site if possible) to the DSL (or deputy) and/or technical staff.
  - The breach will be recorded and escalated as appropriate.
  - Parents/carers will be informed of filtering breaches involving their child.
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our AUP, Managing Allegation Against Staff (including Low Level Concerns) Policy and Behaviour policies.
  - Parents/carers will be informed of filtering breaches involving their child.
  - Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material), [Kent Police](#), [NCA-CEOP](#) or [Kent Integrated Children's Services via the Kent Integrated Children's Services Portal](#).
  - If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

### **Appropriate monitoring**

- We will appropriately monitor internet use on all trust/school provided devices and networks. This is achieved by:
  - Physical monitoring (supervision) and monitoring internet and web access (reviewing filtering information).
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
  - Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - Where the concern relates to staff, it will be reported to the headteacher (in the case of school staff), the trust leader (in the case of central team staff or headteachers) or the Chair of Trustees (in the case of the Trust Leader), in line with our Managing Allegations Against Staff (including Low Level Concerns) Policy.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, [Kent Police](#) via 101, [NCA-CEOP](#), LADO or [Kent Integrated Children's Services via the Kent Integrated Children's Services Portal](#).

### 6.3 Information security and access management

- CPP is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in the staff handbook and the AUP.
- CPP will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.
- The Trust Leader, Mark Chatley, and the Trustee with responsibility for safeguarding, Isabelle Linney-Drouet are responsible for ensuring that our trust has met the DfE cyber security standards for schools and colleges.

### 6.4 Remote/Online learning

- CPP will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers will take place using school/trust provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems: Office 365.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our Behaviour Policy and AUP
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

### 6.5 Online Safety Training for Staff

- CPP will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

### 6.6 Educating pupils

- CPP and its schools will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

### 6.7 Working with parents/carers

- CPP will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:
  - Regular newsletter updates
  - Specific online safety updates

- Twitter, 'X', announcements
- Parental engagement events
- CPP will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online
- Where the school or trust is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

## 7. Staff Engagement and Expectations

### 7.1 Staff awareness, induction and training

- All members of staff have been provided with a copy of part one or annex A of the current version of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
  - School and trust leaders, including the DSL and both governors and trustees will read KCSIE in its entirety.
  - School and trust leaders and all members of staff who work directly with children will read annex B of KCSIE.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is stored on MyConcern and on staff training records in Arbor.
- 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 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's internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners and explores the Kent processes to follow. Any visitor is given a safeguarding leaflet containing the key safeguarding information. Volunteers have a designated person to support them in their role and understanding how to keep children safe. New staff would follow the CPP induction procedures which includes safeguarding, online safety and child protection.
- All staff members (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. This takes the form of a longer, annual update as well as regular shorter updates through staff meetings and/or briefings.
- 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. Specific training on online safety is delivered and supported by The National College/National Online Safety.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- CPP 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 schools' safeguarding

arrangements and child protection policies. A DSL group across the trust shares important information and lessons learned.

- All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to 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 and is supported by resources from The National College/National Online Safety.
- The DSL and headteacher will provide an annual report to the LGB detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained. In addition, the Trust will provide a Trust Wide Annual report and an external review of safeguarding will be undertaken biannually.

## **7.2 Safer working practice**

- Our trust 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 code of conduct.
- The DSL will ensure that all staff (including contractors) and volunteers are aware of the school expectations regarding safe and professional practice via the staff Behaviour Policy, Staff Code of Conduct and Acceptable Use Policy (AUP)
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any 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 behaviour policy and Acceptable Use Policies (AUPs).

## **7.3 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).
- 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 Education Support Partnership or other similar organisations directly.

## 8. Safer Recruitment and Allegations Against Staff

### 8.1 Safer recruitment and safeguarding checks

- CPP is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
  - CPP will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
  - Trust Central Team and school leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  - The Trust Central Team and school leadership team will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The schools maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- CPP 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 to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the school/college places a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will need to satisfy ourselves that the provider can meet the needs of the pupil.
  - CPP will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school/college would otherwise perform in respect of our own staff.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE.

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

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and the [local Kent allegations arrangements, including discussions as necessary with the Local Authority Designated Officer \(LADO\)](#). In depth information can be found within our 'Managing Allegations against Staff' Policy and the Staff Code of Conduct. This can be found on the trust and school websites.
- 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 headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the Education Safeguarding Service.

- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteacher (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.
- In the situation that the school or trust receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO.

### 8.2.1 Concerns that meet the 'harm threshold'

- CPP 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
  - possibly committed a criminal offence against or related to a child
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with Part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the headteacher who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the Trust Leader who will contact the LADO. If the allegation of abuse is being made against the trust leader, staff are advised that allegations should be reported to the trustees (contact details of trustees is included in the staff handbook).

### 8.2.2 Concerns that do not meet the 'harm threshold'

- CPP may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our Allegations against Staff (including low level concerns) Policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
  - CPP has an open and transparent culture in which all concerns about all adults working in or on behalf of the trust are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the trust are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
  - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the trust may have acted in a way that is inconsistent with our code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
  - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our Allegations against staff (including low level concerns) policy through Confide which selected senior leaders will see and deal with.
  - Where low-level concerns are reported to the schools, the headteacher will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
  - The headteacher will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
  - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
  - If the schools and trust are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

### 8.3 Safe Culture

- As part of our approach to safeguarding, the trust has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the trust safeguarding regime. The leadership team at each school and within the trust will take all concerns or allegations received seriously.
- All members of staff are made aware of the trust Whistleblowing procedure which is on the trust and school websites. 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).
- CPP 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 in our trust, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#) and/or the Trust HR department (who will take advice from our HR support provider)

## 9. Opportunities to Teach Safeguarding

- CPP 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 the broad and balanced curriculum we offer, particularly RSE.
- We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.
- CPP recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- CPP and the schools in the trust have a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- CPP recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.
- Our trust systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

## 10. Physical Safety

### 10.1 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 and is in line with the DfE ['Use of reasonable force in schools'](#) guidance.

### 10.2 The use of school premises by other organisations

- Where the school facilities or premises are rented/hired out to organisations or individuals 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 our 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 headteacher, supported by the trust central team, 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.

### 10.3 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into schools as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The trust and its schools 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.

## 11 . Local Support

- All members of staff in trust are made aware of local support available.
  - **Education Safeguarding Service**
    - **Area Safeguarding Advisor**
      - 03301 651 440
      - [www.theeducationpeople.org/our-expertise/partner-providers/kent-county-council-providers/safeguarding/](http://www.theeducationpeople.org/our-expertise/partner-providers/kent-county-council-providers/safeguarding/)
    - **Online Safety in the Education Safeguarding Service**
      - 03000 423164
      - [onlinesafety@kent.gov.uk](mailto:onlinesafety@kent.gov.uk) (non-urgent issues only)
  - **LADO Service**
    - 03000 410888 or [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
  - **Kent Integrated Children's Services/ Children's Social Work Services**
    - Front Door: 03000 411111 or Out of Hours Number: 03000 419191
  - **Early Help**
    - [www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-services](http://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-services) and [www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts](http://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts)
  - **Kent Police**
    - 101 or 999 if there is an immediate risk of harm
  - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
    - [www.kscmp.org.uk](http://www.kscmp.org.uk) or 03000 421126 or [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
  - **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)

## Appendix 1: Categories of Abuse

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

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

**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 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, for example, anxiety of being left with relatives, a childminder 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 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
- 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: Support Organisations

### NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for Children: [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Children's Society: [www.childrenssociety.org.uk](http://www.childrenssociety.org.uk)
- Centre of Expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

### 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)
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

### Support for pupils/students

- 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)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

### Support for Adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.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)
- Advice now: [www.advicenow.org.uk](http://www.advicenow.org.uk)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

### Contextual Safeguarding Network

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

### Kent Resilience Hub

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

### Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): [www.nicco.org.uk/](http://www.nicco.org.uk/)



## Substance Misuse

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

## 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 Phoneline: <https://respectphoneline.org.uk>

## Criminal and Sexual Exploitation

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals: [www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit](http://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit)
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: <https://tce.researchinpractice.org.uk/>

## Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- 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)
- The right to choose - government guidance on forced marriage: [www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage](http://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage)

## 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)

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

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: [www.brook.org.uk](http://www.brook.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)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Diana Award: [www.antibullyingpro.com](http://www.antibullyingpro.com)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

- Centre of expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

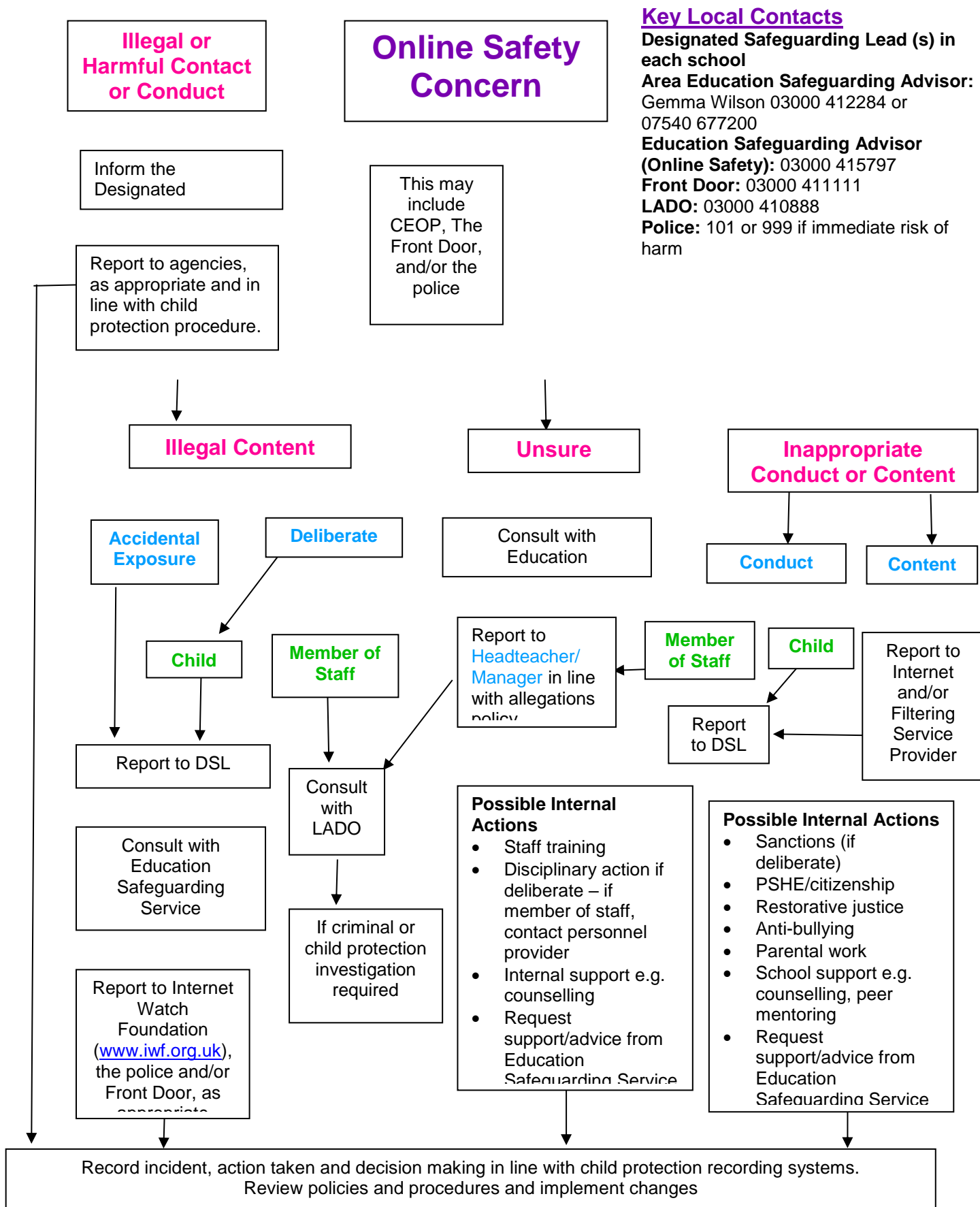
### Online Safety

- NCA-CEOP: [www.ceop.police.uk](http://www.ceop.police.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.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>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/online-safety](http://www.nspcc.org.uk/online-safety)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)

### Mental Health

- 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: [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)

# Responding to an Online Safety Concern Flowchart



## Pupil Acceptable Use Agreement 2023

I understand that these rules will keep me safe and help me to be fair to others.

- I only use the internet when an adult is with me or if I have asked permission from an adult
- I only click on links and buttons when I know what they do
- I only use websites and search engines that my teacher has chosen
- I use my school computers for school work unless I have permission otherwise
- I only send messages online which are polite and friendly
- I know the school can see what I am doing online
- I know that if I do not follow the rules online then there will be consequences for my actions (just as there are in school and at home)
- I always credit the person or source that created any work, image or text I use
- I always talk to an adult if I'm not sure about something or if something happens online that makes me feel worried or frightened
- I keep my personal information safe and private online
- I will keep my passwords safe and not share them with anyone
- I will not access or change other people's files or information
- I will only post pictures or videos on the Internet if they are appropriate and if I have permission
- I will only change the settings on the computer if a teacher/technician has allowed me to
- I understand that the school's internet filter is there to protect me, and I will not try to bypass it.
- I know that people I meet online may not always be who they say they are. If someone online suggests meeting up, I will immediately talk to an adult
- If I see anything online that I shouldn't or that makes me feel worried or upset then I will minimise the page and tell an adult straight away
- I have read and talked about these rules with my parents/carers
- If I am aware of anyone being unsafe with technology then I will report it to a teacher
- I can visit [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk) and [www.childline.org.uk](http://www.childline.org.uk) to learn more about keeping safe online

I have read and understand these rules and agree to them.

Signed (pupil): \_\_\_\_\_ Date: \_\_\_\_\_

I have read and understand the AUP and will support Coppice Primary Partnership in ensuring acceptable use of the internet and school IT systems

Parent signature: \_\_\_\_\_ Date: \_\_\_\_\_



## Visitor / Volunteer / Governor Acceptable Use Policy 2023

As a professional organisation with responsibility for children's safeguarding it is important that we take all possible and necessary measures to protect data and information systems from infection, unauthorised access, damage, loss, abuse and theft. We have a responsibility to use the school's computer system in a professional, lawful, and ethical manner. To ensure that guests are fully aware of their professional responsibilities when using Information Communication Technology and the school systems, they are asked to read and sign this Acceptable Use Policy.

This is not an exhaustive list and guests are reminded that ICT use should be consistent with the school ethos, other appropriate policies and the Law.

- I will ensure that any personal data of pupils, staff or parents/carers is kept in accordance with Data Protection legislation, including GDPR. Any data which is being removed from the school site, such as via email or on memory sticks or CDs, will be encrypted by a method approved by the school. Any images or videos of pupils will only be used as stated in the school image use policy and will always reflect parental consent.
- I have read and understood the school online safety policy which covers the requirements for safe ICT use, including using appropriate devices, safe use of social media websites and the supervision of pupils within the classroom and other working spaces.
- I will follow the school's policy regarding confidentiality, data protection and use of images and will abide with copyright and intellectual property rights, child protection legislation, privacy and data protection law and other relevant civil and criminal legislation.
- My electronic communications with pupils, parents/carers and other professionals will only take place within clear and explicit professional boundaries and will be transparent and open to scrutiny. Any pre-existing relationships or situations that may compromise this will be discussed with the Designated Safeguarding Lead / Headteacher.  
*Governors only - All communication will take place via school approved communication channels such as via a school provided email address or telephone number and not via personal devices or communication channels such as via personal email, social networking or mobile phones.*
- My use of ICT and information systems will be compatible with my role within school. This includes the use of email, text, social media, social networking, gaming, web publications and any other devices or websites. I will take appropriate steps to protect myself online and my use of ICT will not interfere with my work duties and will always be in accordance with the school AUP and the Law.
- I will not create, transmit, display, publish or forward any material that is likely to harass, cause offence, inconvenience or needless anxiety to any other person, or anything which could bring my professional role, the school, or the County Council, into disrepute.
- I will promote online safety with the children in my care and will help them to develop a responsible attitude to safety online, system use and to the content they access or create.
- If I have any queries or questions regarding safe and professional practise online either in school or off site, I will raise them with the Designated Safeguarding Leader for my school.
- I will report any incidents of concern regarding children's online safety to the Designated Safeguarding Lead as soon as possible.
- I understand that if the school believes inappropriate use or unacceptable behaviour is taking place, the school may invoke its disciplinary procedure. If the school suspects criminal offences have occurred, the matter will be brought to the attention of the relevant law enforcement organisation.

*The School may exercise its right to monitor the use of information systems, including Internet access and the interception of e-mails in order to monitor compliance with this Acceptable Use Policy and the School's Data Security Policy. Where it believes unauthorised and/or inappropriate use of the service's information system or unacceptable or inappropriate behaviour may be taking place, the School will invoke its disciplinary procedure. If the School suspects that the system may be being used for criminal purposes or for storing unlawful text, imagery or sound, the matter will be brought to the attention of the relevant law enforcement organisation.*

**I have read and understood and agree to comply with the Visitor / Volunteer / Governor Acceptable Use Policy.**

Signed: ..... Print Name: ..... Date: .....



## Staff Acceptable Use Policy 2023

***As a professional organisation with responsibility for children's safeguarding it is important that all staff take all possible and necessary measures to protect data and information systems from infection, unauthorised access, damage, loss, abuse and theft. All members of staff have a responsibility to use the school's computer system in a professional, lawful, and ethical manner. To ensure that members of staff are fully aware of their professional responsibilities when using Information Communication Technology and the school systems, they are asked to read and sign this Acceptable Use Policy.***

**This is not an exhaustive list and all members of staff are reminded that ICT use should be consistent with the school ethos, other appropriate policies and the Law.**

- I understand that Information Systems and IT include networks, data and data storage, online and offline communication technologies and access devices. Examples include laptops, mobile phones, tablets, digital cameras, email and social media sites.
- School owned information systems must be used appropriately. I understand that the Computer Misuse Act 1990 makes the following criminal offences: to gain unauthorised access to computer material; to gain unauthorised access to computer material with intent to commit or facilitate commission of further offences or to modify computer material without authorisation.
- I understand that any hardware and software provided by my workplace for staff use can only be used by members of staff and only for educational use. To prevent unauthorised access to systems or personal data, I will not leave any information system unattended without first logging out or locking my login as appropriate. I will protect the devices in my care from unapproved access or theft.
- I will respect system security and will not disclose any password or security information. I will use a 'strong' password to access school systems. A strong password has numbers, letters and symbols, with 8 or more characters, does not contain a dictionary word and is only used on one system.
- I will not attempt to install any purchased or downloaded software, including browser toolbars, or hardware without permission from the system manager.
- I will ensure that any personal data of pupils, staff or parents/carers is kept in accordance with the Data Protection legislation (including GDPR).
  - This means that all personal data will be obtained and processed fairly and lawfully, only kept for specific purposes, held no longer than necessary and will be kept private and secure with appropriate security measures in place, whether used in the workplace, hosted online or accessed remotely.
  - Any data being removed from the school site (such as via email or on memory sticks or CDs) will be suitably protected. This may include data being encrypted by a method approved by the school.
  - Any images or videos of pupils will only be used as stated in the school image use agreement and will always reflect parental consent.
- I will not keep documents which contain school-related sensitive or personal information, including images, files, videos and emails, on any personal devices, such as laptops, digital cameras, and mobile phones. Where possible, I will use the School network to upload any work documents and files in a password protected environment or via VPN.
- I will not store any personal information on the school computer system including any school laptop or similar device issued to members of staff that is unrelated to school activities, such as personal photographs, files or financial information.
- I will respect copyright and intellectual property rights.
- I have read and understood the school online safety policy which covers the requirements for safe IT use, including using appropriate devices, safe use of social media and the supervision of pupils within the classroom and other working spaces.

- I will immediately report any illegal, inappropriate or harmful material or incidents I become aware of, to the Designated Safeguarding Lead for my school.
- I will not attempt to bypass any filtering and/or security systems put in place by the school. If I suspect a computer or system has been damaged or affected by a virus or other malware, or if I have lost any school related documents or files, I will report this to the ICT Technician team as soon as possible.
- My electronic communications with current or past pupils, parents/carers and other professionals will take place within clear and explicit professional boundaries and will be transparent and open to scrutiny.
  - All communication will take place via school approved communication channels, such as a school provided email address or telephone number.
  - Any pre-existing relationships or situations that may compromise this will be discussed with the Designated Safeguarding Lead /or Headteacher.
- I will ensure that my online reputation and use of IT and information systems are compatible with my professional role, whether using school or personal systems. This includes the use of email, text, social media, social networking, gaming and any other devices or websites.
  - I will take appropriate steps to protect myself online as outlined in the Online Safety policy and will ensure that my use of IT and the internet will not undermine my professional role, interfere with my work duties and will be in accordance with the school code of conduct and the Law.
- I will not create, transmit, display, publish or forward any material online that is likely to harass, cause offence, inconvenience or needless anxiety to any other person, or anything which could bring my professional role, the school, or the County Council, into disrepute.
- I will promote online safety with the pupils in my care and will help them to develop a responsible attitude to safety online, system use and to the content they access or create.
- I will not open any hyperlinks or attachments in emails unless they are from a known and trusted source. I will report any concerns immediately to a senior leader and IT technician.
- I will not upload, download or access any materials which are illegal, such as child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act.
- If I have any queries or questions regarding safe and professional practise online either in school or off site, I will raise them with the Designated Safeguarding Lead and/or Headteacher.
- I understand that my use of the school information systems, including any devices provided by the school, including the school internet and school email, may be monitored and recorded to ensure the safety of children and staff and to ensure policy compliance. This monitoring will be proportionate and will take place in accordance with data protection, privacy and human rights legislation.
- I understand that the school may exercise its right to monitor the use of information systems, including internet access and the interception of emails, to monitor policy compliance. Where it believes unauthorised and/or inappropriate use, or unacceptable or inappropriate behaviour may be taking place, the school may invoke its disciplinary procedures. If the school suspects criminal offences have occurred, the matter will be brought to the attention of the relevant law enforcement

*The School may exercise its right to monitor the use of information systems, including Internet access and the interception of e-mails in order to monitor compliance with this Acceptable Use Policy and the School's Data Security Policy. Where it believes unauthorised and/or inappropriate use of the service's information system or unacceptable or inappropriate behaviour may be taking place, the School will invoke its disciplinary procedure. If the School suspects that the system may be being used for criminal purposes or for storing unlawful text, imagery or sound, the matter will be brought to the attention of the relevant law enforcement organisation.*

**I have read and understood and agree to comply with the Staff Acceptable Use Policy.**

Signed: ..... Print Name: ..... Date: .....



# Wi-Fi Acceptable Use Policy 2023

As a professional organisation with responsibility for children's safeguarding it is important that all members of the school community are fully aware of the schools' boundaries and requirements when using the school Wi-Fi systems, and take all possible and necessary measures to protect data and information systems from infection, unauthorised access, damage, loss, abuse and theft. This is not an exhaustive list and all members of the school community are reminded that ICT use should be consistent with the school ethos, other appropriate policies and the Law.

The school provides Wi-Fi for the school community and allows access for (school / education use only). I am aware that the school will not be liable for any damages or claims of any kind arising from the use of the wireless service. The School takes no responsibility for the security, safety, theft, insurance and ownership of any device used within the School premises that is not the property of the School.

The use of ICT devices falls under Coppice Primary Partnership school's Acceptable Use Policy, online safety policy, behaviour policy and safeguarding/child protection which all pupils/staff/visitors and volunteers must agree to and comply with.

The school reserves the right to limit the bandwidth of the wireless service, as necessary, to ensure network reliability and fair sharing of network resources for all users.

School owned information systems, including Wi-Fi, must be used lawfully; I understand that the Computer Misuse Act 1990 makes the following criminal offences: to gain unauthorised access to computer material; to gain unauthorised access to computer material with intent to commit or facilitate commission of further offences or to modify computer material without authorisation.

I will take all practical steps necessary to make sure that any equipment connected to the schools' service is adequately secure, such as up-to-date anti-virus software, systems updates.

The school's wireless service is not secure, and the school cannot guarantee the safety of traffic across it. Use of the school's wireless service is done at my own risk. By using this service, I acknowledge that security errors and hacking are an inherent risk associated with any wireless network. I confirm that I knowingly assume such risk.

The school accepts no responsibility for any software downloaded and/or installed, email opened, or sites accessed via the school's wireless service's connection to the internet. Any damage done to equipment for any reason including, but not limited to, viruses, identity theft, spyware, plug-ins or other internet-borne programs is my sole responsibility; and I indemnify and hold harmless the school from any such damage.

The school accepts no responsibility regarding the ability of equipment, owned by myself, to connect to the school's wireless service.

I will respect system security; I will not disclose any password or security information that is given to me. To prevent unauthorised access, I will not leave any information system unattended without first logging out or locking my login as appropriate.

I will not attempt to bypass any of the schools' security and filtering systems or download any unauthorised software or applications.

My use of school Wi-Fi will be safe and responsible and will always be in accordance with the school AUP and the Law including copyright and intellectual property rights. This includes the use of email, text, social media, social networking, gaming, web publications and any other devices or websites.

I will not upload, download, access or forward any material which is illegal or inappropriate or may cause harm, distress or offence to any other person, or anything which could bring the school into disrepute.

I will report any online safety concerns, filtering breaches or receipt of inappropriate materials to the Designated Safeguarding Lead as soon as possible.

If I have any queries or questions regarding safe behaviour online, I will discuss them with Designated Safeguarding Lead or the Headteacher.

I understand that my use of the school Wi-Fi may be monitored and recorded to ensure policy compliance in accordance with privacy and data protection legislation. If the school suspects that unauthorised and/or inappropriate use or unacceptable or inappropriate behaviour may be taking place, then the school may terminate or restrict usage. If the school suspects that the system may be being used for criminal purposes, the matter will be brought to the attention of the relevant law enforcement organisation.

**I have read, understood and agree to comply with Coppice Primary Partnership Wi-Fi Acceptable Use Policy.**

Signed: ..... Print Name: ..... Date: .....





# PTA Social Networking Acceptable Use Policy 2023

*For parents/volunteers running official social media accounts, for example PTA groups and committees*

As part of the school's drive to encourage safe and appropriate behaviour online, I will support the school's approach to online safety. I am aware that (using Facebook, Twitter, WhatsApp) is a public and global communication tool and any content posted may reflect on the school, its reputation and services.

I will not use the site/page/group to express any personal opinions or create, transmit, display, publish or forward any material that is likely to harass, cause offence, inconvenience or needless anxiety to any other person, or anything which could bring the school into disrepute.

I will not disclose information, make commitments or engage in activities on behalf of the school without authorisation from the school Designated Safeguarding Lead or the Headteacher.

- The Headteacher retains the right to remove or approve content posted on behalf of the school.
- Where it believes unauthorised and/or inappropriate use of the site or unacceptable or inappropriate behaviour may be taking place, the school will exercise the right to ask for the content to be deleted or deactivated.

I will ensure that any content posted abides by copyright and intellectual property rights, child protection legislation, privacy and data protection law and other relevant civil and criminal legislation.

I will follow the school's policy regarding confidentiality and data protection/use of images.

- I will ensure that the school has written permission from parents/carers before using images or videos which include any members of the school community.
- Any images of pupils will be taken on school equipment, by the school and in accordance with the school image policy. Images which include pupils will only be uploaded by the school via school owned devices. Images taken for the sole purpose of inclusion on the site will not be forwarded to any other person or organisation.

I will promote online safety in the use of the site and will help to develop a responsible attitude to safety online and to the content that is accessed or created.

I will set up a specific account/profile using a school provided email address to administrate the site and I will use a strong password to secure the account.

- The school Designated Safeguarding Lead or the Headteacher will have full admin rights to the account.

I will ensure that the content and channel is suitable for the audience and will be sensitive in the tone of language used. I will ensure content is written in accessible plain English.

I will report any accidental access or receipt of inappropriate materials or inappropriate comments to the Designated Safeguarding Lead or the Headteacher immediately.

I will ensure that the site is moderated on a regular basis as agreed with the Designated Safeguarding Lead or the Headteacher.

I have read and understood the school online safety policy which covers the requirements for safe ICT use, including using appropriate devices and the safe use of social media.

- I have ensured that the site has been suitably risk assessed and this use has been agreed by the Headteacher.

If I have any queries or questions regarding safe and acceptable practise online, I will raise them with the Designated Safeguarding Lead or the Headteacher.

**I have read, understood and agree to comply with Coppice Primary Partnership PTA Social Networking Acceptable Use Policy**

Signed: ..... Print Name: ..... Date: .....

Accepted by: ..... Print Name: .....



# Official Social Networking Acceptable Use Policy for Staff 2023

## *For staff running official school social media accounts*

As part of the school's drive to encourage safe and appropriate behaviour in the use of today's technology, I will support the school's approach to online safety. I am aware that the school website, Twitter, Instagram is a public and global communication tool and that any content posted may reflect on the school, its reputation and services.

I will not use the sites to express any personal opinions or create, transmit, display, publish or forward any material that is likely to harass, cause offence, inconvenience or needless anxiety to any other person, or anything which could bring the school into disrepute.

I will not disclose information, make commitments or engage in activities on behalf of the school without authorisation from the school Designated Safeguarding Lead or the Headteacher. The Headteacher retains the right to remove or approve content posted on behalf of the school.

I will ensure that any content posted abides by copyright and intellectual property rights, child protection legislation, privacy and data protection law and other relevant civil and criminal legislation.

I will follow the school's policy regarding confidentiality and data protection/use of images.

- This means I will ensure that the school has written permission from parents/carers before using images or videos which include any members of the school community.
- Any images of pupils will be taken on school equipment, by the school and in accordance with the school image policy. Images which include pupils will only be uploaded by the school via school owned devices. Images taken for the sole purpose of inclusion on the sites will not be forwarded to any other person or organisation.

I will promote online safety in the use of Twitter / Instagram / school website and will help to develop a responsible attitude to safety online and to the content that is accessed or created. I will ensure that the communication has been appropriately risk assessed and approved by the Designated Safeguarding Lead / Headteacher prior to use.

I will set up a specific account/profile using a school provided email address to administrate the account/site/page and I will use a strong password to secure the account. Personal social networking accounts or email addresses will not be used.

- The school Designated Safeguarding Lead and/or Headteacher will have full admin rights to the sites.

Where it believes unauthorised and/or inappropriate use of the sites or unacceptable or inappropriate behaviour may be taking place, the school will exercise the right to ask for the content to be deleted or deactivated.

I will ensure that the content and channel is suitable for the audience and will be sensitive in the tone of language used and will ensure content is written in accessible plain English.

I will report any accidental access or receipt of inappropriate materials or inappropriate comments to the Headteacher and / or Designated Safeguarding Lead urgently.

I will ensure that the site/page is moderated on a regular basis as agreed with the school Designated Safeguarding Lead.

I have read and understood the school online safety policy which covers the requirements for safe IT use, including using appropriate devices and the use of social media. I have ensured that the site has been suitably risk assessed and this use has been agreed by the Headteacher.

If I have any queries or questions regarding safe and acceptable practise online I will raise them with the Designated Safeguarding Lead or the Headteacher.

**I have read, understood and agree to comply with the Coppice Primary Partnership Social Networking Acceptable Use policy.**

Signed: ..... Print Name: ..... Date: .....

Accepted by: ..... Print Name: .....



## Consent Form - Use of Images of Children 2023

Generally photographs are a source of pleasure and pride. We believe that the taking and use of photographs can enhance the self-esteem of children and their families and therefore is something to be welcomed and appreciated.

We may take photographs for a number of reasons whilst your child is with us, including:

Displays around school

For the school prospectus and school website

Documenting and recording education activities

Recording their learning and development progress

Recording special events and achievements

We will also encourage children to be active learners, and to become involved in using cameras themselves by taking photos of their surroundings, activities and of each other.

We do however recognise that with the increase in use of technologies, particularly digitally and online, the potential for misuse has become greater and we understand that this can give rise to concern. We will therefore endeavour to put effective safeguards in place to protect children and young people by minimising risk.

We are mindful of the fact that some families may have reasons why protecting a child's identity is a matter of particular anxiety. If you have special circumstances either now or at any time in the future which would affect your position regarding consent, please let us know immediately in writing.

We include the safe use of images as part of our Online Safety Policy, which you can view on the school website. We include photos of pupils on our school website and Twitter / Instagram account if we have the correct permissions to do so. On occasions the school may be visited by the media who will take photographs or film footage of a visiting dignitary or other high profile event. Pupils will often appear in these images, which may appear in local or national newspapers, or on televised news programmes.

To comply with current GDPR requirements and the Data Protection Act, we require your permission for the following. Please could you answer the questions below, then sign and date the form where shown.

Childs Name.....Class ..... Please circle your answer

1. May we use your child's photograph (with no name) in publications that we may produce for promotional purpose including the school prospectus, website and Twitter / Instagram account ? Yes / No
2. May we use your child's photograph (with first name) in publications that we may produce for promotional purpose including the school prospectus, website and Twitter / Instagram account ? Yes / No
3. May we use video footage of your child (with no name) in publications that we may produce for promotional purposes including the school prospectus, website and Twitter / Instagram account ? Yes / No

- |    |  |          |
|----|--|----------|
| 4. | May we use video footage of your child (with first name) in publications that we may produce for promotional purposes including the school prospectus, website and Twitter / Instagram account ?           | Yes / No |
| 5. | Do you consent to your child's photograph being published by the press or media (as described above - In this event the school will do their best to ensure that only the child's first name is published) | Yes / No |

### Conditions of use of images by the school

1. This form is valid from the date you sign it, for the period your child attends school. The consent will automatically expire after this time. It is your responsibility to let us know if you want to withdraw or change your agreement at any time.
  2. The school will not use the personal details or full names (first name and surname) of any child in a photographic image on video, school displays or in any other of our printed publications.
  3. If we use photographs or video of individual pupils, we will not use the surname of that child in the accompanying text or photo caption, unless we have your agreement.
  4. We may use group or class photographs or video footage with has very general labels, such as "a science lesson" or "fun at the fete"
  5. We will only use images of pupils who are appropriately dressed, to reduce the risk of images being used inappropriately.
  6. As the child's parent/carer we agree that if we take photographs or video recordings of our child/children which include other pupils, we will use these for personal and family use only. I/we understand that where consent has been obtained from other parents for any other use, we would be in breach of Data Protection Act 1998 if we used our images for any wider purpose. We will not post images of other children (i.e. not our own children) on the internet e.g. social networking sites without the express permission of their parent/carer.
  7. The school will take photos and video footage to celebrate learning for use in school without permissions from parents / carers. These will be stored securely on the school network if digital and possibly printed for use on display or in photo albums.
- I have read and understood the conditions of use and I am also aware of the following:
    - Websites and social media sites can be viewed worldwide; not just in the United Kingdom where UK law applies.
    - The press are exempt from GDPR and Data Protection Act and may want to include the names and personal details of children and adults in the media.
  - I/we will discuss the use of images with our child/ren to obtain their views, if appropriate.
  - As the child's parents/guardians, we/I agree that if we/I take photographs or video recordings of our child/ren which include other children, then we will only use these for our personal use.

.....  
Signature of Parent / Carer

.....  
Date