

## SAFEGUARDING (& CHILD PROTECTION)

### 1. KEY CONTACT DETAILS:

Proprietor: Sam Antrobus - 01249 479070, [sam.antrobus@wishford.co.uk](mailto:sam.antrobus@wishford.co.uk)

Designated member of governance with safeguarding responsibility: Paul Easterbrook  
[paul.easterbrook@wishford.co.uk](mailto:paul.easterbrook@wishford.co.uk)

Designated Safeguarding Lead: Joanna Woodhead 01304 813 409 [joanna.woodhead@stfaithsprep.com](mailto:joanna.woodhead@stfaithsprep.com)

Deputy Designated Safeguarding Lead(s): Amy Cavanagh 01304 813 409 [amy.cavanagh@stfaithsprep.com](mailto:amy.cavanagh@stfaithsprep.com)

Helen Coombs 01304 813 409 [head@stfaithsprep.com](mailto:head@stfaithsprep.com)

Designated practitioner to take the lead in EYFS: Chloe Swan 01304 813 409 [chloe.swan@stfaithsprep.com](mailto:chloe.swan@stfaithsprep.com)

Designated teacher for children in need including looked after children: Joanna Woodhead 01304 813 409  
[joanna.woodhead@stfaithsprep.com](mailto:joanna.woodhead@stfaithsprep.com)

Head: Mrs Helen Coombs 01304 813 409 [head@stfaithsprep.com](mailto:head@stfaithsprep.com)

SENDCo: Yvette Allen 01304 813 409 [yvette.allen@stfaithsprep.com](mailto:yvette.allen@stfaithsprep.com)

Mental Health lead: Joanna Woodhead 01304 813 409 [joanna.woodhead@stfaithsprep.com](mailto:joanna.woodhead@stfaithsprep.com)

Multi-Agency Safeguarding Hub (MASH): 03000 41 11 11 [Childrens Portal \(kent.gov.uk\)](http://Childrens Portal (kent.gov.uk))

Out of hours duty service: 03000 41 91 91

Local Authority Designated Officer (LADO)\*: Central LADO team 03000 410888, [Request for Support - Professionals \(kent.gov.uk\)](http://Request for Support - Professionals (kent.gov.uk))

Local Authority Children's Social Services: 03000 411 111, [Request for Support - Professionals \(kent.gov.uk\)](http://Request for Support - Professionals (kent.gov.uk)),  
03000 41 91 91

Support and advice about extremism: Rachel Murray 03000 413 439 [Rachel.Murray@kent.gov.uk](mailto:Rachel.Murray@kent.gov.uk)

Other Local Safeguarding Partnership contacts (LCSP):

Police Emergency - 999 / Police non-emergency 101

Police non-emergency local point of contact:

Department for Education non-emergency number 020 7340 7264 [counter.extemism@education.gov.uk](mailto:counter.extemism@education.gov.uk)

SO15 Counter Terrorism Intelligence Officer: 020 7340 7264 [counter.extemism@education.gov.uk](mailto:counter.extemism@education.gov.uk)

Prevent Engagement Officer: Rachel Murray 03000 413 439 [Rachel.Murray@kent.gov.uk](mailto:Rachel.Murray@kent.gov.uk)

Local Prevent

<http://educateagainsthate.com>

NSPCC: for concerns about a child and reporting abuse in education and for advice on protecting children with SEND 0800 136 663 email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Childline Helpline for those under 18 and under:

Samaritans: 116 123, [jo@samaritans.org](mailto:jo@samaritans.org)

Whistleblowing (for staff who do not feel able to raise concerns regarding child protection failures internally) [help@nspcc.org.uk](mailto:help@nspcc.org.uk) 0800 028 0285 (8am - 8pm)

OFSTED (Safeguarding children) - 0300 123 4666 (Mon - Fri 8am - 5pm) Email: [CIE@ofsted.gov.uk](mailto:CIE@ofsted.gov.uk)  
[whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

Disclosure and Barring Service - P.O Box 3961 Royal Wootton Bassett SN4 4HH Tel: 03000 200 190 email: [customer.services@db.s.gov.uk](mailto:customer.services@db.s.gov.uk)

Teaching Regulation Agency (TRA) 020 7593 5393 [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk). General enquiries  
0370 000 2288

Independent Schools Inspectorate: email: [concerns@isi.net](mailto:concerns@isi.net) 020 76000100

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**2. POLICY STATEMENT**

This policy applies to St Faith’s Prep School which includes the EYFS setting. This policy is applicable to the whole school community, including all staff, teaching and non-teaching, Wishford personnel, volunteers, temporary and non-temporary supply/visiting staff and contractors working in the school and all pupils. The proprietor will ensure that all staff and volunteers are aware of the new policy and are kept up to date as it is revised. The school continues to be responsible for the safeguarding of pupils placed in alternative provision and will satisfy itself that the placement meets the pupil’s needs.

**Policy Consultation, Monitoring & Review**


The school monitors and evaluates its Safeguarding policy and procedures through the following activities:

- Proprietor visits to the school
- Senior Management/Leadership Team discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities e.g. sufficient account must be taken of the nature, age range and other significant features of the school, such as historical issues, in the provisions made for safeguarding
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team
- The Head reports on safeguarding monthly to the. A safeguarding committee, including the Proprietor and Director of Education meets termly to review all aspects of safeguarding including policies and procedures. They receive a safeguarding report recording any training that has taken place and any outstanding training required and will also record all safeguarding activity that has taken place. It will not identify individual pupils. They also receive an Annual Safeguarding Review and question and discuss the contents and review the role of the DSL
- Regular review of parental concerns and parental questionnaires
- All staff undertake safeguarding training on a regular basis.

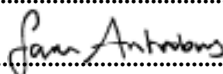
The policy is provided to all staff at induction. In addition, all staff are provided with Part One and annex A or B as necessary of the statutory guidance [‘Keeping Children Safe in Education’](#), DfE (2024).

This policy is reviewed and revised by Wishford Governance on an annual basis, at minimum. It is available on the school’s website or on request at the school office. This policy was reviewed for 1<sup>st</sup> September 2024 to include changes to KCSIE. It is due for review for September 2025 or before if legislation changes

Signed:

Headteacher ..... 

Date: 22 April 2022

Chair of Wishford (or representative)..... 

Date: 22 April 2022

### 3. STATEMENT OF INTENT & RELEVANT LEGISLATION

The safety, welfare and best interests of all our pupils are our highest priority. Our primary concern is to provide a secure and caring environment so that every pupil can learn in safety and we can act in their best interests. Parents/guardians have an important role in supporting our school. If necessary they should use this policy for concerns about the safety and/or welfare of children. Parents may contact ISI directly if they wish. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy.

The principles embedded in this policy link into other policies relating to: EYFS, Health and Safety, PHSEE, Relationship Education, Relationships and Sex Education (RSE), Anti-Bullying, Behaviour and Discipline, Equal Opportunities, Special Educational Needs and Disabilities, Attendance and children absent from education, Extremism, promoting British values, Female Genital Mutilation (FGM) Educational visits, E-Safety, Whistleblowing, Safer Recruitment, Safer Working Practices. The list is not exhaustive.

This policy sets out how the proprietor is carrying out his statutory responsibility to safeguard and promote the welfare of children in accordance with and regard to any guidance issued by the Secretary of State contained and supplemented by the detailed procedures and practices of Kent County Council the Local Safeguarding Children Board (LSCP) as part of the multi-agency safeguarding arrangements and the requirements of the Teacher Standards.

- 'Keeping Children Safe in Education DfE September 2024 (KCSIE) which incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018) and the non-statutory advice for practitioners: [What to do if you're worried a child is being abused - advice for practitioners](#) (March 2015)
- 'Working Together to Safeguard Children', DfE (December 2023) (WT) - the non-statutory advice [Information sharing](#) DfE (July 2018)
- What to do if you are worried a child is being abused (Mar 2015)
- Early Years Foundation stage (EYFS) Statutory Framework January 2024 - statutory guidance
- Kent County Council Safeguarding Children Partnership Procedures and protocol: Allegations Against Persons Who Work With Children
- Children Missing Education (September 2016) Statutory Guidance
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (May 2019)
- [Prevent Duty Guidance for England and Wales \(December 2023\): Departmental advice for schools and childcare providers](#) DfE (June 2015) The use of school media for on-line radicalisation (July 2015)
- Children's Social Care National Framework (December 2023)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(September 2021\)](#)
- [ISSRs \(April 2024\) - statutory requirements](#)
- [The Childcare Act 2006 \(August 2018\)](#)
- Multi-Agency guidance on FGM (July 2020) [Mandatory Reporting of Female Genital Mutilation-procedural information](#) Home Office (December 2015)
- [Sexual violence and sexual harassment between children in schools and colleges DfE \(September 2021\)](#)
- [Child sexual exploitation: guide for practitioners](#) DfE (February 2017)
- [Teaching online safety in school DfE \(June 2019\)](#)
- [Working together to improve school attendance \(August 2024\)](#)
- [Keeping children safe in and out of school settings \(Apr 2022\)](#)
- [Digital and technology standards in schools and colleges \(Mar 2023\)](#)
- [After school clubs, community activities and tuition \(September 2023\)](#)
- [Mental Health and Behaviour in Schools DfE \(September 2022\)](#)
- [Data protection: toolkit for schools](#) DfE Data Protection guidance for schools
- Promoting the education of children with a social worker (June 2021) (June 2021)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)

#### 4 PURPOSE & AIMS

The purpose of St Faith's Prep School's safeguarding Policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. This means we will always work to ensure our legal responsibility to safeguard and promote the welfare of all children and to:

- 4.1 Protect children and young people from maltreatment. Preventing impairment of children's and young people's mental and physical health or development. Ensure that children and young people grow up in circumstances consistent with the provision of safe and effective care: and take action to enable all children and young people at our school to have the best outcomes.
- 4.2 Our school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered pupils at our school. All members of staff have a duty to safeguard our pupils' welfare and will familiarise themselves and comply at all times with this policy. Staff are required to be alert to any possible concerns. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and multiple issues may overlap. Behaviours linked to drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. The elements of our policy are prevention, protection and support.
- 4.3 This policy will give clear direction to all staff including supply staff, volunteers, contractors, visitors and parents about expected behaviour.
- 4.4 To ensure that all necessary internal and inter-agency child protection procedures are in place as required when children may be suffering or at risk of "significant harm". We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who have unexplained and/or persistent absences from education, particularly on repeat occasions. The Attendance Lead will liaise with the DSL to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses are in place to reduce the risk of future harm.

#### 5 OUR ETHOS

- 5.1 The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. The school promotes a positive, supportive and secure ethos, giving pupils a sense of being valued and providing an environment in which children can learn and develop safely. Staff are always available to children and we have a *worry bunny* in place for those children who would rather write down a concern than initially speak directly to a member of staff.
- 5.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at our school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child. We recognise that because of the day to day contact with children, staff in school are well placed to observe the signs of possible abuse.
- 5.3 The Proprietor will appoint a senior board level lead to take leadership and responsibility for the school's safeguarding arrangements
- 5.4 At St Faith's Prep School we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at their heart. It is important for children to receive the right help at the right time and **early help** is key to pupil wellbeing in order to address risks and prevent issues escalating. We must not be guilty of: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to reassess concerns when the situation does not improve, sharing information too slowly and not challenging those who appear not to be taking action.

5.5 This school recognises its responsibility to discuss with social care/Social Services, the Police and the three safeguarding partners any significant concerns about a child which may indicate:

Physical abuse  
Emotional abuse  
Sexual abuse  
Neglect  
Child on child Abuse

In accordance with Kent County Council these concerns cannot be kept confidential. This school also recognises its duty to work with other agencies in protecting children from harm and in responding to concerns about possible abuse, including the three safeguarding partners, Police, Child and Adolescent Mental Health Services, Education Welfare Service, Education Psychology Service and other agencies/services coming into school to support individual pupils/groups of pupils. Staff will be able to contribute to any assessment or meeting about the child held under LSCP and the three safeguarding partners procedures as required. To ensure we refer to the police immediately, where appropriate 'When to call the police': Guidance for schools and colleges is included in the NPCC guidance

5.6 Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

5.7 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

5.8 Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online). The curriculum will cover relevant topics in an age and stage of development appropriate way, and enable pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. Further information can be found in the DfE guidance ['Teaching online safety in school.'](#) and ['Relationships Education, Relationships and Sex Education and Health Education.'](#) The school uses JIGSAW to deliver PSHE lessons and each year the children review age appropriate themes that teach them about their rights and responsibilities and how-to safe staff. The school engage with safer internet week throughout the year and pupils are taught how to stay safe online in weekly computing lessons and a termly e-safety assembly. Weekly assemblies promote pupil welfare and Fundamental British Values and ethos of the school.

5.9 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children](#) (2018) and the Kent County Council [Multi Agency Safeguarding Partnership arrangements](#).

5.10 Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse'. In the first instance it will be discussed with the DSL who will consider the appropriate action in accordance with the safeguarding partners threshold document. As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:

- is disabled and has specific additional or educational needs; (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour;
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- is misusing drugs or alcohol themselves;

- is at risk of modern slavery, trafficking, radicalisation or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse or at risk of experiencing family ostracism
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child
- has a parent or carer in custody, or is affected by parental offending
- is frequently missing/goes missing from education, home or care

5.11 The school will support pupils in accordance with his/her agreed child protection plan as required. The school will notify any concerns or changes about a child who has a child protection plan or is known to have an allocated social worker, (shared by Kent County Council), to the child’s social worker or in her/his absence the manager or a duty officer in the team. The school will inform the social worker of any decisions made in the best interests of the child’s safety, welfare and educational outcomes. The school will co-operate with other agencies and the LSCP advice to act in the best interests of the child at all times.

We recognise that children who are abused or who witness violence may experience difficulties which impact on their sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.

The school will provide support by:

- ensuring that the curriculum and ethos of the school support the child
- providing sufficient resources and time with regards to safeguarding and releasing staff in order that they can participate in safeguarding/child protection processes, core groups and meetings (especially child protection conferences and child in need meetings)
- ensuring that the attendance of any child subject to a child protection plan, or otherwise believed to be at risk of harm, is closely monitored
- including specific training to understand the safeguarding risks of looked after children
- Supporting children who face educational barriers to learning such as poor attendance, learning difficulties, behaviour and mental health.

To ensure that all of our pupils receive equal protection we will give special consideration to children who are:

- Prolonged absence from education
- looked After Children
- at risk of Fabricated or Induced Illness
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying including cyber, homophobic, racist etc
- live transient lifestyles
- LGBT (lesbian gay bisexual transgender)
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or
- do not have English as a first language

## 6 ROLES & RESPONSIBILITIES

The dates of their most recent training for those named on page 1 are:

ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Joanna Woodhead	01304 813 409 <a href="mailto:joanna.woodhead@stfaithsprep.com">joanna.woodhead@stfaithsprep.com</a>

<b>Deputy Designated Safeguarding Lead (DDSL)</b>	Amy Cavanagh	01304 813 409 <a href="mailto:amy.cavanagh@stfaithsprep.com">amy.cavanagh@stfaithsprep.com</a>
<b>Designated Safeguarding Lead for EYFS</b>	Chloe Swan (Nursery)	01304 813 409 <a href="mailto:chloe.swan@stfaithsprep.com">chloe.swan@stfaithsprep.com</a>
<b>Mental Health Lead</b>	Joanna Woodhead	01304 813 409 <a href="mailto:joanna.woodhead@stfaithsprep.com">joanna.woodhead@stfaithsprep.com</a>
<b>Headteacher/Deputy Designated Safeguarding Lead</b>	Helen Coombs	01304 813 409 <a href="mailto:helen.coombs@stfaithsprep.com">helen.coombs@stfaithsprep.com</a>
<b>Named Safeguarding Governance Lead</b>	Paul Easterbrook	<a href="mailto:paul.easterbrook@wishford.co.uk">paul.easterbrook@wishford.co.uk</a>

The dates of their most recent training are:

Joanna Woodhead DSL Safeguarding Training 4<sup>th</sup> February 2025.

Amy Cavanagh DSL Safeguarding Training 9<sup>th</sup> January 2024. Operation Encompass Training March 2022

Helen Coombs Safeguarding Training 4<sup>th</sup> February 2025.

Chloe Swan Early Years Designated Safeguarding Lead Training: completed 14<sup>th</sup> November 2025. Operation Encompass Training March 2024.

The DSL (Joanna Woodhead) is Deputy Head Pastoral and a member of the school's Senior Management Team and is the direct link with SMT and held accountable for safeguarding by the Head. They have a weekly slot to talk about safeguarding during weekly Senior Leadership Meetings and Staff Meetings. They also chair bi-weekly meetings with the Safeguarding Team (Amy Cavanagh, Helen Coombs and Chloe Swan) in which the whole school is reviewed (including EYFS), recorded and then fed back to SLT by the Deputy Head at SLT meetings or meetings with the Head as appropriate. Safeguarding forms part of the agenda at all staff meetings and this enables effective communication as well as staff reporting incidents on an individual basis.

Deputy Designated Safeguarding Leads Amy Cavanagh and Helen Coombs supports the DSL and takes over if the DSL is absent when a safeguarding event occurs. They ensure staff are aware that Safeguarding is everyone's responsibility, taking part in bi-weekly meetings with the Safeguarding Team and Staff Meetings.

Designated Safeguard Lead EYFS Chloe Swan supports the DSL and feeds back information from the EYFS setting within the school during bi-weekly Safeguarding Team meetings. They are our lead nursery practitioner and ensures all the EYFS staff are aware of safeguarding procedures.

## Governance

6.1 The Proprietor and the Director of Education of Wishford Schools champion safeguarding within the school and ensure the effectiveness of this policy and our compliance with it.

6.2 The Proprietor will ensure that:

- The safeguarding policy is in place, reviewed annually, is available on our school website and written in line with Local Authority guidance and the requirements of the Local authority Safeguarding Children Partnership policies and procedures. Remedy without delay any weakness in regard to safeguarding arrangements brought to their attention;
- The school contributes to inter-agency working in line with Working Together;
- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL who is appropriately trained to deal with any issues in the absence of the DSL
- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the school's safeguarding response for those pupils who are absent from education.
- All staff (including the Head) undertake appropriate child protection training that is updated at least annually and on-line safety training;
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;



- All staff understand the relevant data protection principles which allow them to share (and withhold) personal information
- Safer recruitment practices are followed in accordance with the requirements of ['Keeping Children Safe in Education'](#) DfE (2024);
- Will consider the numbers and age range of their pupils, those who are potentially at risk of harm and how often they access the IT systems along with the proportionality of costs versus safeguarding risks. [www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges](http://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges). The systems are reviewed at least annually by the proprietor and the school.

### The Head

6.3 At St Faith's Prep School the Head is responsible for:

- Identifying a senior member of the leadership team to be DSL);
- Identifying members of staff to be the DSL to ensure there is always cover for the role;
- Ensuring that the policies and procedures adopted by Wishford Schools, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and concerns are addressed sensitively in accordance with agreed whistleblowing procedures;
- Liaise with the LADO if an allegation of abuse is made against a member of staff or volunteer.
- Ensuring a Mental Health Lead is appointed

### The Designated Safeguarding Lead (DSL)

6.4 The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined ['Keeping Children Safe in Education' September 2024](#).

6.5 The DSL provides advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in writing and given to the DSL.

During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and/or any other relevant media. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable.

School's arrangements for any out of hours/out of term activities availability (for example holiday club, overseas visits, residential trips etc). Joanna Woodhead is always on call and staff have her contact details; Chloe Swan works on a year-round basis and therefore is working during the school holidays and all staff are sent an email when Chloe Swan is their onsite first port of call in the absence of Joanna Woodhead, Amy Cavanagh or Helen Coombs.

6.6 The DSL will represent the school at child protection conferences and core group meetings. With training, knowledge and experience our DSL will liaise with Children's Services and other agencies and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other inter-agency meetings and contribute to the assessment of children.

6.7 The DSL will be equipped to be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for these decisions. This will include instances where referrals were or were not made to another agency such as the local authority, children's social care or the prevent programme.

6.8 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedures to follow. They will ensure that all staff, volunteers and regular visitors have

received appropriate child protection information during induction and have been trained within the school to the agreed school's [safeguarding training pack](#) provided by Children's Services.

6.9 The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.

6.10 The DSL(s) will work with the headteacher and senior leaders, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement. This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.

6.11 We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes.

## **7 INDUCTION AND TRAINING**

All staff are recruited in accordance with the Safer Recruitment Policy. (See separate policy)

7.1 The Proprietor will ensure that all staff, both teaching and non-teaching, receive appropriate induction, prior to the start of term, and regular training to equip them to carry out their responsibilities for safeguarding and child protection effectively, as prescribed in government Guidance and in accordance with the expectations of the LSCP and the three safeguarding partners. All staff will receive the policies listed below before they commence work and will record they have read them and discussed them with the DSL

During their induction period and before they join the school, every new member of staff, supply staff, contractor or volunteer will receive safeguarding training. It includes:

- a review of the school's Safeguarding and Child Protection Policy and Compliance guidance including how to record and report safeguarding concerns;
- The role and identity of the DSL;
- A copy of Part 1 of KCSIE at least (or, for staff that do not work directly with children, Annex A as determined by Proprietor and Head)
- For school leaders and those who work directly with children Annex B and Part 5 of KCSIE
- The Behaviour Policy (including measures to prevent bullying, including cyber bullying, prejudiced based and discriminatory bullying);
- The staff code of conduct including the whistleblowing procedure in respect of concerns about another adult's behaviour and suitability to work with children.
- The safeguarding response to children who go absent from education
- Mental Health Policy
- Acceptable use of IT including staff/pupil relationships and online safety. This will include an understanding of the expectations, acceptable roles and responsibilities in relation to filtering and monitoring; Please refer to the Mobile Technology Policy;
- Prevent training that extends to all staff;
- How to manage a disclosure from a child (including reassuring victims that they are being taken seriously and will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47
- How to manage a report on sexual violence and sexual harassment in line with KCSIE 2024;
- acceptable use of communications and media.
- Staff are made aware of the signs, symptoms and indicators of abuse and are required to take action without delay if such a practice is suspected;
- An appreciation of how and when to report low level concerns.

7.2 The proprietor also ensures that in addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as

set out in Part one of ‘*Keeping Children Safe in Education*’. In order to achieve this, we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis and we will evaluate the impact of this training;
  - all staff members receive regular safeguarding and child protection updates, as required, but at least annually. It will include online safety, and harmful sexual behaviours (including child on child abuse and sexual violence and sexual harassment) and Prevent Awareness training;
  - The Proprietor will ensure that all members of the Governance team receive appropriate safeguarding and child protection training and regular updates. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. The training will be regularly updated.
  - The Proprietor is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements. Under the Human Rights Act it is unlawful for a school to act in a way that is incompatible with the European Convention on Human Rights (ECHR). Being subjected to harassment, violence or abuse, including that of a sexual nature, may breach conventions as set out in the ECHR.
  - The school understands and recognises their obligations under the Equality Act 2010 and must not discriminate against pupils because of a protected characteristic including: sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity or sexual orientation. The school will consider how to effectively safeguard any pupil with specific individual needs and make reasonable adjustments for disabled pupils.
  - The school complies with its duties under the Equality act to put in place provision to support dialogue with children who may not be able to convey their wishes and feelings as they might want to. This includes those with language difficulties and for whom English is not their first language.
- 7.3 All regular visitors, temporary staff, contractors and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of whom our DSL and alternate staff members are and what the recording and reporting system is
- 7.4 The DSL, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Kent County Council Safeguarding Children’s Partnership at least once every three years. The DSL and DDSLs will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years. In addition to formal training, DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role. The DSL keeps up to date with any developments through accessing weekly e-couriers, disseminating national and local updates to staff via attendance at cluster meetings. DSL and DDSLs share information during their bi-weekly meetings and discuss their findings. DSL and DDSL attend Kent County Council cluster meetings in which an array of safeguarding topics are discussed.
- 7.5 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of ‘*Keeping Children Safe in Education*’ (2024) provides links to guidance on specific safeguarding issues such as Child Sexual Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via the local LSCP.
- 7.6 All staff sign to say that they have read and understood KCSIE Part 1 including Annex B (if required) and the school’s Safeguarding and Child Protection policy at regular intervals or when new guidance is issued. All existing staff complete an annual update regarding their personal circumstances. ( See also Induction of New Staff Policy)

## **8 PROCEDURES FOR MANAGING CONCERNS**

- 8.1 St Faith’s Prep School adheres to child protection procedures that have been agreed locally through the Kent County Council Safeguarding Children Partnership. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with [Kent County Council Local Assessment Protocol](#) and the Kent County Council [Threshold Guidance](#).
- 8.2 All staff are to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often,

concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL to access support for the child at the earliest opportunity. A reliance on memory without accurate, contemporaneous records of concern could lead to a failure to protect.

- 8.3 It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 8.4 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL so that appropriate agencies can be informed within 24 hours or, if unavailable, to the appropriate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
- 8.5 All concerns about a child or young person should be reported without delay and recorded in writing using the agreed system in the setting by using CPOMS or using a written structure such as Annex D which will then be uploaded to CPOMS. Records will include:
- a clear and comprehensive summary of the concern
  - details of how the concern was followed up and resolved
  - a note of any action taken, decisions reached and the outcome
  - On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.
- 8.6 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Kent County Council Children's Advice & Duty Service (CADS) as required. All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals will be made in line with local authority Children's Services procedures.
- 8.7 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Kent County Council CADS immediately. Anybody can make a referral in these circumstances. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headteacher. Concerns should always lead to help for the child at some point.
- 8.8 Staff should always follow the reporting procedures outlined in this policy in the first instance. They may also share information directly with Kent County Council CADS, or the police when:
- the situation is an emergency and the designated senior person, their alternate and the Headteacher are all unavailable;
  - they are convinced that a direct report is the only way to ensure the pupil's safety.
  - it is suspected that a crime has been committed the matter will be referred to the police from the outset by the DSL.
  - In relation to our nursery/EYFS setting, the school will inform Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.
  - The school will inform Ofsted, within 14 days, of any significant event likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided.
- 8.9 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Headteacher or Mr Sam Antrobus (Wishford CEO) or Mr Paul Easterbrook (Director of Education for Wishford Schools). If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Kent County Council directly with

their concerns.

## **9 SPECIFIC SAFEGUARDING ISSUES (INCLUDING BULLYING)**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

All incidences of bullying, including cyber-bullying and prejudice-based bullying will be recorded and reported and will be managed through our behaviour and anti-bullying procedures. All pupils and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals in PSHEE education and through assemblies. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Head and the DSL will consider implementing child protection procedures.

Bullying incidents including discriminatory and prejudicial behaviour e.g. racist, disability and homophobic bullying and use of derogatory language will be recorded and analysed. There will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. The anti-bullying policy is available on the school website

### **Contextual safeguarding**

9.1 At St Faith's Prep School we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school environment and/or can occur between children outside of the school. All staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that 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, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child.

9.2 We recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

### **Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence**

Sexual exploitation of children is not limited by the age of consent and can occur up until the age of 18. It involves children being in situations, contexts or relationships where they (or a third person) receive 'something' as a result of them performing sexual activities. Child sexual exploitation can happen via technology without the child being aware; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability. CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

Characteristics of Child Sexual Exploitation and abuse. Children who:

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections or become pregnant;
- suffer from changes in emotional well-being;
- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education;
- stay away from certain people or avoid being alone with someone;
- display sexual behaviour that is inappropriate for their age;
- an unwillingness to remove clothes when changing for PE

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

9.4 At St Faith’s Prep School we train staff to recognise that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

9.5 At St Faith’s Prep School we recognise that Child Sexual Exploitation is a form of child sexual abuse and this imbalance of power coerces, controls, manipulates or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. Child sexual exploitation does not always include physical contact, it can also occur through the use of technology. Some children may not realise they are being exploited and believe they are in a genuine romantic relationship.

9.6 At St Faith’s Prep School we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. An indicator to identifying potential involvement in county lines are children missing school.

9.7 We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

9.8 At St Faith’s Prep School staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. We make reference to the Home Office’s [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information. These may indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. The following may be indicators:

- Increased absence from school or children who go missing or regularly get home late;
- 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 emotional wellbeing;
- Children who misuse drugs and alcohol;
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions.

If staff have concerns (as opposed to a child being in immediate danger) they should speak to the DSL

9.9 If a child is suspected to be at risk of or involved in county lines, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further guidance is available from the Home Office.

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

9.10 At St Faith's Prep School we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA, they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

9.11 Where FGM has taken place, [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 report to the police where they discover (either through disclosure or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to teachers on this requirement and further information on when and how to make a report can be found in the Home Office guidance: [Mandatory Reporting of Female Genital Mutilation- procedural information](#) (December 2015). Unless there is good reason not to, staff should consider discussing any such cases with the DSL and involve children's social services as appropriate.

9.12 At St Faith's Prep School we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

#### **Preventing radicalisation and extremism**

9.13 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. A risk assessment assessing the risk to children being drawn in to radicalisation is prepared and shared with staff. At St Faith's Prep School, we will ensure that:

- Through training, staff, volunteers and Wishford personnel have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.

The DSL will make referrals in accordance with Kent County Council Channel Procedures and will represent our school at Channel meetings as required. [Managing risk of radicalisation in your education setting - GOV.UK \(www.gov.uk\)](#)

[Making a referral to Prevent - GOV.UK \(www.gov.uk\)](#)

- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.

#### **Child on child allegations and abuse including Child on child sexual violence and sexual harassment. The procedures are to be followed for all accusations and allegations**

9.14 Child on child abuse is one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school and online. It can manifest itself in many ways and can include abuse within intimate partner relationships between peers. It can also

occur through a group of children sexually assaulting or sexually harassing a single child or group of children

9.15 At St Faith's Prep School all staff are trained so that they are aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence such as rape, assault by penetration and sexual assault;
- sexual harassment; such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- gender based issues
- upskirting; which typically involves taking pictures under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim;
- sexual behaviours including child on child sexual violence and sexual harassment, 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.
- Sexting and consensual and non-consensual sharing of nudes and/or semi-nudes, and
- initiation/hazing type violence and rituals.

9.16 We recognise that children are vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, All staff and volunteers must remember the impact on both the victim of the abuse as well as focussing on the support for the child or young person exhibiting the harmful behaviour.

#### **Sharing nudes and semi-nudes**

- We understand that abuse can occur in intimate personal relationships between peers; and that consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) is a form of child on child abuse. UKCIS guidance: *Sharing nudes and semi-nudes advice for education settings working with children and young people March 2024*. For this purpose it means the sending or posting of nudes or semi-nude images, videos or live streams by children under the age of 18 online. It can be via social media (including Snapchat), gaming platforms, chat apps (including Whatsapp and Message) or online forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. It might happen publicly online, in 1-1 messaging or via group chats and/or via closed social media accounts. Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
    - children and young people find nudes and semi-nudes online and share them claiming to be from a peer
    - children and young people digitally manipulate an image of a young person into an existing nude online
    - images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
- 9.17 For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.
- 9.18 All members of staff in an education setting have a responsibility to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.



9.19 Any direct disclosures by a child will be taken seriously and staff will ensure that the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma in them.

9.20 If staff become aware of any incidents they should notify the DSL immediately or as soon as possible.

9.21 The DSL will follow the DDMSC/UKIS guidance when reporting any incidents of nudes or semi-nudes sharing. This will include:

- Holding an initial review meeting with appropriate staff. This may include staff who heard the disclosure, the safeguarding team and the leadership team who deal with safeguarding including Wishford personnel.
- Carrying out interviews with the children involved (if appropriate)
- Informing parents and carers at an early stage unless there is good reason to believe that including them would put the child at risk of harm. Any such decision should be made in conjunction with other appropriate services such as children's social care or the police who will take the lead.
- Carrying out a risk assessment to determine whether there is a concern that the child has been harmed or is at risk of immediate harm. If not, the incident can be handled in school, in accordance with the sharing nudes guidance and the Safeguarding and Behaviour policies.
- If it is determined there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.
- All incidents will be recorded, whether they are referred externally or not with the reason for not referring externally written down signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of any images will be retained.
- If the incident involves an adult sharing images of children under 18 this constitutes sexual abuse and the DSL/Head should be notified immediately, who will inform the police.

We understand, that even if there are no reports in our setting it does not mean it is not happening, it may be the case that it is just not being reported. The school will ensure that children are aware of how they can report abuse in a format that is easily accessible and understood by them and the procedures that the school will follow once a report has been made. A first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be a member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. Pupils may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not feel ready to make a direct report, and this may come from a friend or a conversation that is overheard. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Some pupils might not recognise their experiences as harmful. Staff are aware of this and will observe carefully, engage in general conversation and seek advice and take all the necessary measures to minimise risk to a pupil. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the safeguarding procedures rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LSCP and/ or the police as appropriate. The School will have regard to the procedures in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL. Parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the LSCP referral process. Staff will challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, to avoid the risk of normalising such behaviours.

Staff must never tolerate or dismiss concerns relating to child on child abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'Boys will be boys'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios create a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

### **Sexual Violence and Sexual Harassment**

All staff will be trained in managing a report on sexual violence both as part of induction and at regular intervals and will understand that they should follow our safeguarding procedures for reporting any concerns including child on child abuse. The DSL will respond to any concerns related to child on child abuse in line with guidance outlined in Part five of '*Keeping Children Safe in Education*' and '*Sexual violence and sexual harassment between children in schools and colleges*' (2024). We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up. Effective safeguarding practice will be followed which includes:

- Not promising confidentiality;
- Reassure they are being taken seriously and never give the impression they are causing a problem nor should they feel ashamed by having their experiences minimised;
- Making sure the victim understands the next steps; explain in a way that avoids alarming them that the law is in place to protect children rather than criticise them.
- Recognising that by disclosing the child has put the teacher in a position of trust;
- Listening carefully and not asking leading questions;
- Making notes (as long as it does not prevent you from remaining engaged with the child) and writing up the report as soon as possible;
- Only record the facts as presented by the child;
- Being aware of searching, screening, confiscation and sexting advice for schools if the report includes an online element;
- Managing the reports with two members of staff present (1 preferably being the DSL or DDSL);
- Informing the DSL as soon as possible if they cannot be present.

There are four likely scenarios for us to consider:

1. Manage Internally
2. Early Help
3. Referrals to children's social care
4. Reporting to the police

We will work with other agencies including the police and Children's Social Care and other services to safeguard and promote the welfare of children and protect them from harm, and as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren). Schools have a pivotal role to play in multi-agency safeguarding arrangements. The Proprietor will

ensure that the school contributes to multi-agency work in line with the statutory guidance **Working Together to Safeguard Children** and to ensure the school understands their role in the safeguarding partner arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. The school will make itself aware, through the DSL, of the published arrangements of who they will be working with and the expectations placed on any agencies and organisations by the local arrangements. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. We shall allow access for children's social care from the host local authority or, where appropriate, a placing local authority, to conduct or consider conducting a section 17 or a section 47 assessment.

Support will depend on the circumstances of each case and the needs of the child. If a report of this nature is made it may include completion of risk assessments by the DSL to support children (the victim, the alleged perpetrator and all the other children (and if appropriate staff) to remain in school and considers any actions to protect them from the alleged perpetrator(s) or future harm. Risk assessments will be recorded and kept under review. This risk assessment will not replace the detailed assessments of expert professionals. The DSL will engage with children's social care and specialist services as required. It will also consider delivery of early intervention and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a pupil discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Kent County Council but the victim must live in Kent County Council to access support. The SARC also has a 24/7 helpline 01603 276381 if pupils or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The wishes of the victim as to how to proceed will be considered as fully as is possible within the confines of this policy and the staff will act in the best interests of the child.

### **Modern Slavery**

**At St Faith's Prep School** we understand that 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. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature. for concerns of this nature.

**10 CHILDREN ABSENT FROM EDUCATION- applies to whole school including EYFS. (This includes the Safeguarding responses to children who go absent from education). This includes the KSCIE 2024 requirements for prolonged children absence**

### **10.1 Introduction**

The welfare of all our children at St Faith's Prep School is our paramount responsibility. It takes full account of the child protection procedures agreed by Kent County Council and statutory guidance. A child who is absent from an education setting is a potential indicator of abuse and neglect, child sexual and/or criminal exploitation and county lines. It might indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risks of FGM, so called "honour" based abuse. The School will put in place appropriate safeguarding responses if children are absent from school. We will follow-up unexplained absences of any student with a telephone call from the school office on the morning of the first day of absence and priority will be given to vulnerable children especially those on a Child Protection Plan. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child being absent in the future. The designated safeguarding lead (DSL) will notify social services if there is an unexplained absence of more than two days of a student who is on the student safeguarding register. The School works within the guidelines of the safeguarding partners details and will access the services for Children Missing Education within the borough/County L.A. The school will follow their protocol to identify children absent from education. This applies to all starters and leavers at non-standard transition points. Any changes to our admission register will trigger notification to our Single Point of Contact (SPOC) at L.A Welfare Service (Caroline Soutan - Email: [caroline.soutan@kent.gov.uk](mailto:caroline.soutan@kent.gov.uk) Tel: 03000 412592)

The school will view absence as both a safeguarding issue and an educational issue. Termly Persistent Absence data i.e Head's percentage of acceptable attendances % or below will be reported to our SPOC Tel: 03000 419328 Email: [debbie.sales@kent.gov.uk](mailto:debbie.sales@kent.gov.uk) at Kent Education Welfare Service. The DSL Joanna Woodhead will also inform her of any student who has been absent without the school's permission for 10 continuous school days. Additionally, the school secretary will notify Debbie Sales of any student who is going to be deleted from the admissions register where the student:

- has been taken out of school by his/her parents and is being educated outside the school system e.g. elective home education; has ceased to attend the school and no longer lives within reasonable distance;
- If the child has an EHC plan the school will notify the LA who should review the plan and work closely with parents and carers
- has been permanently excluded;
- have been certified by the school medical officer, or their doctor, as unlikely to be in a fit state of health to attend school before ceasing to be of the school's leaving age
- has been removed from the admissions register at non-standard transitions i.e. where a child leaves St Faith's Prep School before completing Year 6.

10.2 At St Faith's Prep School all staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future. This school has in place the means to monitor potential safeguarding risks through its checking and administration procedures.

10.3 At St Faith's Prep we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are absent from education:

- Every child is placed in the school's admissions register from the day they start at the school regardless of their age. If a child fails to attend on the first agreed day the head and DSL must be contacted immediately who will consider notifying the L.A. The admissions register will be updated to recognise any change in circumstance for the child. The admission register and attendance register are legal documents and are kept for 5 years from the date of leaving.
- An attendance register is taken at the start of each school day and once during the afternoon session and an explanation for any absence is sought immediately. The Local Authority is informed if a child has been absent without the school's permission for a continuous period of 10 school days or more;
- Our staffing ratios are generous and are designed to ensure every child is supervised the whole time they are in our care;
- We make every effort to contact parents and carers and follow up with the emergency contacts held for any unexplained or prolonged absence;
- We hold at least two emergency contact numbers for each of the pupils on our roll wherever possible.
- Staff will alert DSLs to any concerns raised regarding children who are absent from school;
- The DSLs will meet regularly with the Attendance Lead, SENCo and other members of the pastoral team to ensure that each response is thorough and takes into account all the relevant information about individual children;
- We will follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained and prolonged absences. A record is kept by the school of any instances in which a pupil is absent from school without satisfactory permission and documentation, including the action taken and the pupil's explanation.
- Where a pupil has been continuously absent, without authorisation, for a period of not less than 20 school days (and there are no reasonable grounds to believe the pupil is unwell or unable to attend because of any unavoidable cause), and the school and LA have failed, following reasonable enquiry to ascertain where the pupil is, the school may delete the pupil's name from the admissions register and will notify the LA at the time of deletion;
- When removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files and for any of the following we follow the same procedures:

St Faith's Prep School respond promptly children who are absent from education- for example home visits, referral to Parent Support Advisor, attendance panel meetings with parents and carers etc....]

### **Requests for special leave**

Parents requesting special leave have to fill in an absence form which is then passed to the Head. The absence may be declared authorised or may be refused. If the parents then take the child out of school, this becomes an unauthorised absence. The school will be mindful of risks to children including FGM and travelling to conflict zones.

We will always assess the child's safeguarding risk at their own address using [thresholds and pathways](#). For example, is there a risk of forced marriage, child sexual exploitation, domestic abuse, radicalisation, honour based violence? If the judgement is the child is at risk of harm, contact the police or [social care immediately](#).

### **Absence after a holiday**

After every holiday, including half term, the parents of any absent children are immediately contacted to ensure that the children have not gone on unauthorised extended leave. Any requests for extended leave in school time are refused unless parents can provide evidence of an emergency.

Patterns of children absent from education can be an indicator of either abuse or safeguarding risks. A relatively short period a child is absent does not reduce the risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

Designated Safeguard Leads (DSLs) and staff should consider:

Single missing days:

- Is there a pattern in the day missed?
- Is it before or after the weekend suggesting the child is away from the area?
- Are there specific lessons or members of staff on these days?
- Is the parent informing the school of the absence on the day?
- Are missing days reported back to parents to confirm their awareness?
- Is the child being sexually exploited during this day? Do the parents appear to be aware?
- Are the pupil's peers making comments or suggestions as to where the pupil is?

Continuous missing days:

- Has the school been able to make contact with the parents? Is medical evidence being provided?
- Are any siblings attending school (either our or local schools)?
- Did we have any concerns about radicalisation, FGM, forced marriage, honour-based violence or sexual exploitation?
- Have we had any concerns about physical or sexual abuse?

### **Children Missing from Home or Care**

Children who run away from home or from care provide a clear behavioural indication that they are either unhappy or do not feel safe in the place that they are living. Children run away from conflict, neglect, abuse, problems at home or school, or because they are being groomed by predatory individuals who seek to exploit them.

The association of chief police officers has provided the following definitions and guidance.

*A "Missing" person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'*

An “Absent” person is: ‘A person not at a place where they are expected or required to be.’

All cases classified as Missing by the police will receive an active police. Cases where the child is classified as absent will be recorded by the police and risk assessed regularly. The Absent case will be resolved when a young person returns or new information suggests that he/she is at risk: the case is upgraded to Missing.

Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers;
- Feeling powerless;
- Being bullied/abused;
- Being unhappy/not being listened to;
- The Toxic Trio (domestic violence, mental ill-health and drug/alcohol misuse (as defined by Ofsted)). Working Together notes these issues rarely exist in isolation. There is a complex interaction between the three issues.

Pull factors include:

- Wanting to be with family/friends;
- Drugs, money and any exchangeable item;
- Peer pressure;
- For those who have been trafficked into the United Kingdom as unaccompanied asylum seeking children there will be pressure to make contact with their trafficker

As a school we will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of Missing is met, we will either support the parent to/directly contact the police to inform them.

### **Students being withdrawn from school**

If a student is withdrawn from the school the local Welfare Service will be notified so every effort is made to confirm the school to which the student is being admitted; confidential educational and child protection records will be sent separately. Educational records receive concerning a student who is not registered by will be returned and the school advised to refer to their Local Authority Education Welfare Service.

Proposed timeline for reporting a child absent from education

Day 1 - Phone call

A staff member trained to do so, telephones the child’s home to seek reasons for the absence and reassurance from a parent or carer that the child is safe at home.

<b>Response from parent</b>	<b>Next step from school</b>
There is no answer at the home or on mobile numbers	Call back. Risk assess after 2 hours
The parent/carer answered the call, the child is safe with them	Ask for reason for absence and record on your school's attendance management system
The person answering is not the parent/carer and the school is not reassured that the child is at home or safe	The school’s designated lead for child protection should be consulted on a risk assessment and the degree of vulnerability of the child.

The parent/carer answered the call, the child is not with them or safe and the parent is concerned

School to advise the parent to:

- Contact the local police station to inform them that the child is absent
- Contact all people and places the child is known to talk to and visit to tell them that the child is absent and ask if they can help to find the child, by providing information which may shed light on the child's whereabouts or actively searching for the child
- Contact the family GP and Accident and Emergency Centres near where the child lives and goes to school, in case he/she has sustained an injury and been taken in for medical treatment
- Report back to school if the child is found or remains absent

Day 2 - Follow up phone call

A subsequent telephone call must be made either from the school landline or preferably a mobile phone.

Day 3 - Write/email parents

Write or email to the parent in plain English, asking for contact to be made with the school immediately. Please give the parents/carers 3 working days to make contact and if you are aware that English may not be the parent's first language, copy the letter into a language that may be more accessible.

Day 5/6 - Home visit

Arrange a visit to the home address ensuring that risk assessments are in place

Once you have completed these checks (or within 10 days, whichever is earlier)

If the child has not been seen and the parents or carers have not made contact, schools must report the child as absent from education.

## 11 MENTAL HEALTH

The school has an important role to play in supporting the mental health and wellbeing of its pupils.

- 11.1 At St Faith's Prep School all staff are made aware, through training, 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. Our 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. We aim to prevent problems by promoting resilience as part of the whole school approach to social and emotional wellbeing. (insert reference to wellbeing policy if you have one)
- 11.2 Staff are aware of how children's experiences can impact on their mental health, behaviour, attendance and progress at school.
- 11.3 We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences, can impact on their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a child that is *also* a safeguarding concern, they should take immediate action by passing the information on to a Designated Safeguarding Lead.
- 11.4 At St Faith's Prep School we have a named Mental Health Lead Joanna Woodhead. There are clear systems and processes in place for identifying possible mental health problems, working with other agencies and accessing resources, as required to respond to these concerns. We refer to the Mental Health and Behaviour in Schools' DfE guidance for further support.

## 12. ONLINE SAFETY

- 12.1 At St Faith's Prep School *all staff are aware that technology is a significant component in many safeguarding and wellbeing issues.* Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

- 12.2 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered, We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.
- 12.3 More details can be found in our policies on Online Safety, E-Safety and Mobile and Smart Technology which consider the 4Cs, content, contact, conduct and commerce. These policies include details on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. We will ensure internet filters are in place as well as appropriate monitoring systems to safeguard children from potentially harmful and inappropriate material online when using the school's IT system, without unreasonably impacting teaching and learning. This includes consensually and/or non-consensually sharing indecent images, sexually harassing their peers via mobile and smart technology, and viewing and sharing pornography and other harmful content whilst at school undetected. We will ensure our pupils are educated in online safety.
- 12.4 The DSL is responsible for the Online Safety of the children and the understanding of the filtering and monitoring systems and processes the school has in place and relays any online safety breaches and filtering issues to the Wishford IT Team. The school recognises that children have unlimited access to the internet via mobile phone networks. The use of such devices is fully outlined in the Mobile Phone and Camera Policy and IT Policy. The Wishford IT Team are always available to discuss and oversee our internet safety and use Sisco Meraki group filtering with additional white and black listings and Sensornet. The school and the DSL are ultimately responsible for ensuring safe filtering and computer usage. We recognise that technology, and risks and harms evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, including filtering and monitoring, supported by a risk assessment that considers and reflects the risks that children face in our setting.

### Cybercrime

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

If there are concerns about a child and cybercrime, the DSL will consider a referral to the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Further advice is available from Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

## 13 PUPILS WITH SPECIAL EDUCATIONAL NEEDS/DISABILITIES & PHYSICAL HEALTH ISSUES

- 13.1 At St Faith's Prep School we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
  - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
  - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
  - communication barriers and difficulties in managing or reporting an incident because of their vulnerability, disability, cognitive understanding (knowing fact from fiction in online content) sex, ethnicity and/or sexual orientation.
- Repeating the content or behaviours seen and not understanding the consequences.
- 13.1 We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- 13.2 The local IAS service provides legally based information, advice and support on educational matters relating to special educational needs and disabilities, including health and social care. Email: [iask@kent.gov.uk](mailto:iask@kent.gov.uk), telephone: 03000 41 3000.



- 13.3 At St Faith's Prep School we also recognise that pupils who attend Alternative Provision will often have complex needs and due to this we are aware of the additional risk of harm these children may be vulnerable to.
- 13.4 All staff should be aware of the associated risks and understand the measures in place to manage any serious violence or sexual harassment incidents.
- Both sexes may be affected although girls are more likely to be the victims of sexual violence and boys are more likely to be perpetrators of sexual harassment, this is not always the case. Such child on child abuse can be same gender based i.e boys/boys or girls/girls.
  - When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered

#### **14 RECORDS AND INFORMATION SHARING**

- 14.1 If staff are concerned about the welfare or safety of any child at our school, they will record their concern through the setting's electronic system CPOMS or if there is an electronic issue then using a written structure such as Annex D which will then be uploaded to CPOMS. Any concerns should be passed to the DSL without delay.
- 14.2 Any information recorded will be kept in a separate named file, in a secure cabinet if a paper system is used and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within school on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential. All records will be retained at least until the accused has reached normal pension age or for a period of ten years, whichever is longer.
- 14.3 Child protection information will be kept up to date. Each concern logged will include:
- a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved;
  - a note of any action taken, decisions reached and the outcome.
- Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file whether an electronic or paper system is used. All our safeguarding records will include; a chronology, contents, front cover and will record significant events in the child's life.
- 14.4 When a child leaves our school, (including in year transfers) the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be within 5 days for an in-year transfer or within the first 5 days of the start of a new term. We recognise that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.
- 14.5 We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.
- 14.6 Prior to a child leaving we will consider if it would be appropriate to share any additional information with the new school or college in advance to help them put in place the right support to safeguard this child.
- 14.7 Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns to the [Services to Home Educators Team](#).

#### **15 WORKING WITH PARENTS & CARERS**

- 15.1 St Faith's Prep School is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.
- 15.1 When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact Kent County Council Children's Advice & Duty Service.
- 15.2 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and

confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

15.3 We will seek to share with parents any concerns we have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to Insert local authority) CADS in those circumstances where it is appropriate to do so.

15.4 In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The School will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details in writing.

At St Faith's Prep School we are working in partnership with Kent County Council Constabulary and Kent County Council Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. In order to achieve this, Kent County Council Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our pupils has been present with the Designated Safeguarding Lead. On receipt of any information, the Designated Safeguarding Lead will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with the 'Kent County Council Joint Agency Protocol for Domestic Abuse - Notifications to Schools'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

## **16 CHILD PROTECTION CONFERENCES**

16.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

16.2 Any staff member may be asked to attend a child protection conference or core group meetings on behalf of the school in respect of individual children. Usually the person representing the school at these meetings will be the Headteacher or DSL. The person attending will need to have all relevant up to date information about the child.

16.3 All reports for child protection conferences will be prepared in advance using the guidance provided by the local authority Safeguarding Children Partnership. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at school

16.4 Child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

## **17 SAFER RECRUITMENT**

the school is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of pupils in the school. At St Faith's Prep School we will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, agency staff, contractors, volunteers, students on placement and visiting staff, such as musicians and sports coaches are subject to the necessary statutory safeguarding checks before starting work to include

where necessary a declaration regarding disqualification from working in childcare for all those staff having contact with pupils under the age of 8 under the Childcare Act 2006. If found to be disqualified or there is any doubt the school will remove them from the work from which they may be disqualified. All volunteers and contractors working regularly during term-time, such as contract catering and cleaning staff, are subject to the relevant statutory checks. Confirmation is obtained that appropriate safeguarding checks and procedures apply to any staff employed by another organisation and working with the school's pupils at school or on another site.

Visiting Speakers are researched on the internet before the event and a copy of their speech is requested, in advance, to ensure the content is appropriate. A risk assessment is completed and takes into account any vetting requirements considered appropriate. They are asked to produce ID when arriving at school and supervised on site at all times. All visiting speakers will be expected to understand, where appropriate, their session should actively promote British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine them. A visiting speakers' log will be maintained.

- 17.1 We will ensure that the Headteacher and at least one member of the Wishford Support Office have completed appropriate safer recruitment training. At all times the Headteacher and the Proprietor will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*', DfE (2024). At least one person involved in conducting an interview will have received safer recruitment training.
- 17.2 The school's recruitment process operates in line with the Recruitment Policy, which is reviewed annually or when required by changes in legislation.
- 17.3 We require details of a candidate's present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment and evidence of original academic certificates. References from a senior person with appropriate authority, (including those for internal candidates), will be obtained prior to interview and verified by a phone call. We do not accept testimonials. We will question the contents of application forms, and shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children, if it is not part of our application form. We do not accept stand-alone CVs.
- 17.4 All short-listed candidates will be informed that online searches will be done as part of our due diligence checks.
- 17.5 At St Faith's Prep School we use a range of selection techniques to identify the most suitable person for the post. Structured questions are agreed by the interview panel and any potential areas of concern are explored to determine the applicant's suitability to work with children. All interviews for any potential employee asks safeguarding questions and records, in detail, the responses given
- 17.6 We will undertake Disclosure and Barring Service checks and other pre-employment checks as outlined in '*Keeping Children Safe in Education*' to ensure we are recruiting and selecting the most suitable people to work with our children. In accordance with KCSIE a section 128 check will be carried out for all persons involved in a managerial role or governance of the school, to ensure they are not disqualified from the role.
- 17.7 We will maintain a Single Central Register (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff and the Director of Education for Wishford Schools will check the SCR, at least termly, to ensure that it meets statutory requirements.
- 17.8 At St Faith's Prep School we recognise that safer recruitment is not just about carrying out the right DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. We create the correct culture and environment so that staff feel comfortable to discuss matters both within school and where appropriate outside the work place including online which may have implications for the safeguarding of children.
- 17.9 Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Proprietor is ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

## **Regulated Activity**

The full definition is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and in HM Government a [Factual Note on Regulated Activity in relation to Children scope](#).

Regulated activity includes:

- a) teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children.
- b) work for a limited range of establishments (known as ‘specified places’, which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.
  - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

## **SAFER WORKING PRACTICE**

18.1 All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

18.2 All staff will be provided with a copy of our school’s code of conduct at induction. They will be expected to know our school’s Code of Conduct and policy for positive handling and carry out their duties in accordance with this advice. At all times the agreed policy for safe restraint must be adhered to. A list of staff that have accessed positive handling training will be kept. If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

18.3 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [‘Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings’](#) (May 2019). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

## **19 MANAGING ALLEGATIONS AGAINST STAFF (Including supply staff, contractors & volunteers)**

### **Allegations that may meet the harm threshold**

19.1 The school treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. We provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. The school’s procedures for managing allegations against all adults who are working in the school whether in a paid or unpaid capacity follows DfE statutory guidance and LSCP arrangements.

19.1 Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in *‘Working Together to Safeguard Children’* (2023) and *‘Keeping Children Safe in Education’*, DfE (2024) below. An allegation may relate to a person who works/volunteers with children who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;

- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes circumstances where any member of staff is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

19.2 At St Faith's Prep School we recognise our responsibility to report / refer allegations or behaviours of concern and / or harm to children by adults in positions of trust who are not employed by the School to the LADO service directly at Central LADO team 03000 410888, [Request for Support - Professionals \(kent.gov.uk\)](#) These are adults such as those in the voluntary sector, taxi drivers, escorts, and fosters carers.

19.3 We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol [Allegations Against Persons who Work with Children](#) and Part 4 of 'Keeping Children Safe in Education', DfE (2024) are adhered to and will seek appropriate advice. The first point of contact for schools regarding concerns and/ or allegation issues (including for supply teachers) is via the Local Authority Education Duty Desk on (03000 411 111). A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then a LADO referral form should be completed. The completed LADO referral form is then sent via e-mail. If a teacher or member of staff has concerns, not safeguarding related, about the behaviour of another member of staff towards a pupil, he or she should report it at once to the DSL (or to the Proprietor where the concern relates to the DSL or Head). If there are safeguarding concerns then the procedures at below should be followed. Any concern will be thoroughly investigated under the school's whistleblowing procedures. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body where the circumstances justify it. For more information see our Whistleblowing Policy. Staff may also raise issues directly with the Wishford team by contacting the Proprietor or anonymously using the Wishford website: [www.wishford.co.uk/whistleblowing](http://www.wishford.co.uk/whistleblowing)

19.4 School may receive allegations relating to an incident that happened when an individual or organisation was using the premises. We will follow our safeguarding policy and procedures including informing the LADO

If a member of staff has concerns about the proprietor they should discuss this with the DSL, a member of the Wishford Board (Paul Easterbrook) or use one of the external methods below.

19.5 If an allegation is made or information is received about any adult who works/ volunteer in our setting which indicates that they may be unsuitable to work/volunteer with children, the member of staff receiving the information should inform the Headteacher immediately. This includes concerns relating to agency and supply staff, contractors and volunteers. Should an allegation be made against the Headteacher, this will be reported to the Proprietor of Wishford Schools without the Head being informed. In the event that neither the Headteacher nor Proprietor is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Director of Education for Wishford Schools. Allegations against the proprietor should be referred directly to the LADO.

19.6 The Head or Proprietor (case manager) will seek advice from the LADO within one working day. No member of staff or Wishford personnel will undertake further investigations before receiving advice from the LADO, or prior to the outcomes of an external investigation

The arrangements agreed upon will include informing the parents and seeking their consent for any immediate medical examination if necessary.

The member of staff against whom an allegation has been made would normally be informed as soon as possible after the result of the initial investigation is known, or the decision is made to dispense with one, but not invited to make a response. There should be a warning that anything said will be recorded. The case manager will give careful consideration as to whether the staff member should be suspended or alternative arrangements put in place which might include:

- Redeployment within the school with no direct contact with the child(ren) involved;
- Providing an assistant to be present where the individual has contact with children;

- Redeployment to alternative work in the school with no unsupervised access to children;
- Moving the child(ren) to alternative classes with no contact with the member of staff. (this action should only be taken if it is in the best interests of the child(ren) and is made clear it is not a punishment.
- Temporarily redeploy the member of staff to a different location e.g an alternative school.

If it is established that the allegation is not well founded, either on the basis of the medical evidence or further statements, then the person against whom the complaint has been made would normally be informed that the matter is closed. The complainant and the parents would also need to be informed of this.

If the Police decide to take the case further and the allegation is against a member of staff, he/she would normally be suspended or, where the circumstances are considered to warrant it, dismissed. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff the matter will be dealt with in accordance with the Disciplinary Procedure.

If the abuse is alleged or suspected to have been carried out by a pupil the above procedures will be followed, but in addition the Head must be immediately informed. The Head will follow the procedures set out in the Anti-Bullying Policy and, where appropriate, take advice from the Social Services team in determining what action to take.

During the course of the investigation the school in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

- 19.7 When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the school is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the School will usually take the lead in conducting an investigation as we have direct access to any affected children and other school staff to collect the facts.
- 19.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Proprietor should contact the LADO directly via email to Central LADO team 03000 410888, [Request for Support - Professionals \(kent.gov.uk\)](mailto:Request for Support - Professionals (kent.gov.uk)).
- 19.9 Further information and guidance documents in relation to the LADO process, forms, leaflets and the Allegations against Persons who Work/Volunteer with Children Procedures are found on the Kent County Council Safeguarding Children Partnership website. Further national guidance can be found at: [Advice on whistleblowing](#).
- 19.10 The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The School must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first.
- The following definitions should be used when determining and recording the outcomes of allegations
- Substantiated
  - Malicious (if this is found to be the case, no records will be kept on file)
  - False
  - Unsubstantiated
  - Unfounded (this is the new category to reflect cases where there is no evidence or proper basis which supports the allegation)
- In all circumstances (other than malicious) a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

At the conclusion of any case we will review our procedures to determine whether there are any improvements or changes to be made.

### **Concerns and Allegations that do not meet the harm threshold will be dealt with using the school's Low Level Concerns Policy**

- 19.11 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. As part of the 'low level' concern process school may consult with the Local Authority Education Duty Desk on: 03000 411 111.
- 19.12 We have a policy which sets out what low level concerns are, the importance of sharing these appropriately, how the setting addresses unprofessional behaviour and supports the individual to correct it at an early stage. This includes when staff should self-refer, where they 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.
- 19.13 At St Faith's Prep School we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely and maintained by only one person. We will review the records we hold to identify potential patterns and take action. This could be through a disciplinary process but also by referring to the Local Authority Education Duty Desk on 03000 411 111. Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.
- 19.14 We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

### **20 USE OF PREMISES FOR NON-SCHOOL/COLLEGE ACTIVITIES**

- 20.1 Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe.
- 20.2 We will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 20.3 In the event of the DSL not being in school for any reason, any member of staff who has concerns about any child should contact the DSL as soon as possible. If they are unavailable the Proprietor (or his representative) will take on the DSL's role and will continue to deal with concerns until they return to School. In the unlikely event of there being no DSL in school, a senior member of staff will be designated as a temporary Safeguarding Officer.
- 20.4 [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition)

### **21 RELEVANT POLICIES**

- 21.1 To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded the following policies are also included under our safeguarding umbrella:
- Staff Code of Conduct
  - Low Level Concerns
  - Anti-Bullying
  - Behaviour which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - Recruitment & Selection (which adheres to Part 3 of [Keeping Children Safe in Education](#).)
  - Whistleblowing (Full policy included in safeguarding and child protection policy)
  - Attendance
  - Online Safety
  - Health and Safety including site security
  - Harassment and discrimination including racial abuse
  - Meeting the needs of pupils with medical conditions
  - Intimate Care

- First aid
- Educational visits including overnight stays
- RSHE

## 22 EDUCATING CHILDREN ABOUT SAFEGUARDING

Please also see PSHE/RSE policies and Online Safety in Wishford IT policy

22.1 We raise the awareness of children and equip them with the skills and knowledge needed to keep safe by covering relevant issues through Relationships Education and Relationships and Sex Education and/or through Personal, Social, Health and Economic (PSHE) education. We acknowledge that the Government has made regulations which make the subjects of Relationships Education (for all primary schools) and Relationships and Sex Education (for all secondary schools) mandatory and have regard for the DfE's statutory guidance: *Relationships Education, Relationships and Sex Education (RSE) and Health Education*.

22.2 The PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse. We also ensure that children know that there are adults in the school whom they can approach if they have a concern. It also covers staying safe online, cyber and homophobic bullying and teaches pupils about the risk of radicalisation.

22.3 Through the curriculum and pastoral systems, all staff will raise pupils' awareness and build their confidence and resilience so that they have a range of contacts and strategies to ensure their own protection and that of others, recognising that pupils need opportunities to develop the skills they need to stay safe from harm. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is age appropriate to all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy, including the dangers of Radicalisation.

### 22.4 Photos and cameras

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

To protect all pupils, including those in EYFS, we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- not use pupils full name with an image
- ensure pupils are appropriately dressed
- ensure that personal data is not shared
- store images appropriately, securely and for no longer than necessary
- only use school equipment, i.e. not personal devices
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- In the EYFS personal cameras and phones will be locked away during the day.
- When choosing photographs for the website, we are mindful of the way children may appear in them, and will not include images which are in any way inappropriate.

## 23 PROMOTING & RAISING AWARENESS

23.1 The diagram on page 32 indicates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. **Anybody can make a referral** and everyone has a responsibility to know how to. Staff should never assume that somebody else will take action and share all information that might be critical in keeping a child safe. If staff make a referral they should inform the DSL as soon as possible that a referral has been made.

Actions where there are concerns about a child.

The flow chart on page shows staff which actions to follow if required.

23.2 Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and Religious Studies lessons are used to promote tolerance and mutual respect and understanding.



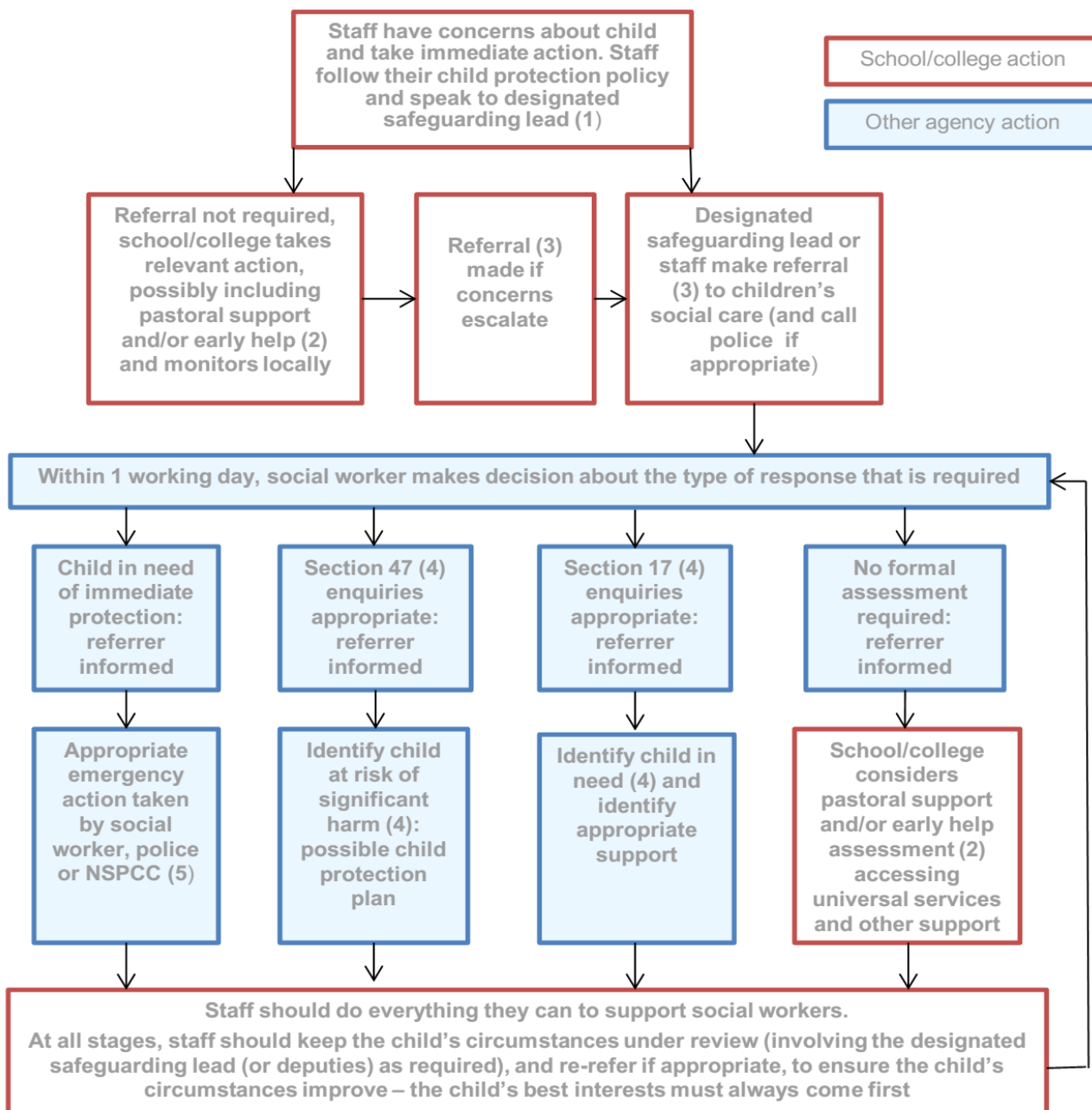
23.3 All pupils know that there are adults to whom they can turn to if they are worried. If the school has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helpline enabling them to call for support in private.
- Every child has identified teachers to whom they can talk, and knows where to access the telephone numbers of Childline and Samaritans.
- Posters with advice on where pupils can seek help.
- We provide regular lessons to pupils for Internet and online safety (including when children are at home) as an integral part of the computing curriculum and ensure that all pupils understand and adhere to the school's guidelines in this area. For more details on cyber-bullying please refer to the school's anti-bullying policy.

#### **Sharing information or images with other agencies, on the website or in the press**

23.4 The school may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. We operate the following policy regarding the use of photographs, to ensure the privacy and safety of children at the school: where a child is named, no photograph of that child is displayed; where a photograph is used which shows a child, no name is displayed and where children are named, only their first names are given.

23.5 The school follows a policy of seeking parents' permission before using images which show children on the website or in the local press. The list showing pupils who are barred from appearing in the press, or on the website, is kept and is available whenever photographers are present. No private information about children is ever published on the website. By observing these points, this school ensures that visitors to the website cannot link images of children to names of children. When choosing photographs for the website, we are mindful of the way children may appear in them, and will not include images which are in any way inappropriate.



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## **24 POSITION OF TRUST**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in a position of trust in relation to the young people in their care which they have a public duty to maintain by keeping them safe. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

## **25 COMPLAINTS PROCEDURE**

Copies of the School's Complaints Procedure can be sent to any parent on request. Any complaint arising from the implementation of this policy will be considered under the School's Complaints Procedure.

## **26 OFF-SITE VISITS**

Appropriate risk assessments must be in place prior to any off-site visit taking place.

Any overnight visit will explicitly set out sleeping arrangements; the role and responsibility of each adult, whether employed or volunteers; on/off duty arrangements; clear expectations about boundaries and interactions with children/young people; and expectations around smoking/drinking by adult.

Safeguarding concerns or allegations will be responded to following the local procedures. The member of staff in charge of the visit will report any safeguarding concerns to the Designated Safeguarding Lead, who will pass to Social Care if appropriate. In an emergency the staff member in charge will contact the police and/or social care.

Staff accompanying overnight trips will receive updated safeguarding training before they depart, and will take part in a de-brief meeting with the DSL following their return, so that they may have an opportunity to discuss any safeguarding concerns they may have had or any required changes to safeguarding policy and procedure.

The Educational Trips Policy should be read for further details.

## **27 WHISTLEBLOWING (policy applies to all areas of the school including EYFS)**

### **1 Introduction**

"Whistleblowing is the reporting of a concern that something is happening within an organisation which shouldn't be, or not happening that should be, which may include wrongdoing or relate to the way the organisation is run." Barnado's -Speak out if you have a concern (2005)

This policy is the formal statement of intent for whistleblowing and meets the terms of the Public Interest Disclosure Act 1998 and its implementation is the responsibility of all staff. St Faith's Prep School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. A culture of openness and accountability is essential in order to prevent situations such as unethical or inappropriate conduct, or unknowingly harbouring unethical behaviour and a danger to health and safety occurring, but these examples are not exhaustive. This policy is written to ensure that anyone can report a concern without fear of victimisation, subsequent discrimination or disadvantage. You must whistleblow on anyone who puts children at risk or if staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding systems. It is your duty. [Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

**Phone this number:** On Duty Referrals 03330 139797

The primary area of concern relates to children's welfare and safeguarding. In such cases, this document should be read in conjunction with the school's Safeguarding and Child Protection Policy, which also lists further sources of advice and guidance. The key principles of which staff should be aware are laid out in the statutory guidance: Keeping Children Safe in Education (KCSIE) (September 2024).

### **2 Aims and Objectives**

Each individual within the school has a responsibility for raising concerns about unacceptable practice or behaviour in order to prevent the problem from worsening or widening, to protect or reduce risks to others or to prevent becoming implicated him/herself. This policy is intended to demonstrate that the school will:

- not tolerate malpractice;
- provide a clear mechanism by which concerns can be raised which is accessible to all staff;
- promote a non-hierarchical culture which is approachable, supportive and protective;
- encourage people to feel confident in raising serious concerns and to question and act upon concerns about practices as soon as possible;
- respect the confidentiality of staff raising concerns and will provide procedures for maintain confidentiality so far as is consistent with progressing the issues effectively;
- provide avenues for people to raise concerns and receive feedback on any action taken outside the normal line management;
- ensure everyone receives a response to any concerns raised;
- reassure individuals that they will be protected from possible reprisals or victimisation if they have a reasonable belief and have made the disclosure in good faith.

#### Scope of this policy

- **This procedure is separate from the school's adopted grievance procedure. Individuals should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances.** There are existing procedures to log a complaint or grievance; this policy is intended to cover major concerns that fall outside the scope of other procedures. **If you are uncertain whether something is within the scope of this procedure seek advice from Tom Hay (School Business Manager).**
  - **Malpractice is not easy to define but could include:**
    - possible fraud/corruption
    - failure to comply with codes of practice
    - conduct which is an offence or a breach of statutory law
    - a criminal offence being committed (past, present or likely to be committed)
    - unauthorised disclosure of confidential information
    - health and safety risks, including risks to the public as well as employees
    - damage to the environment
    - other unethical conduct.
    - sexual or physical abuse or other inappropriate or harmful conduct towards a child (or children), including but not confined to:
      - Bullying, humiliation or any other kind of abuse.
      - Contravening health and safety guidelines in place to protect children.
      - Professional practice that falls short of normally accepted standards.
      - Serious breaches of the school's relevant Staff Code of Conduct.
      - Compromising pupils' welfare, but in a way that does not meet the threshold for child protection intervention.
      - Or that they have concealed or are attempting to conceal any of the above.
  - A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the school and should always be reported under this procedure.

### 3 Assurances to All Employees

The school is committed to good practice and high standards and wants to be supportive of all staff members. It is recognised that the decision to report a concern can be a difficult one to make.

Disclosures made in good faith under this policy will be treated confidentially, seriously and sensitively. Requests for anonymity, where made, will normally be met, but there may be circumstances such as prosecutions or disciplinary investigations where those making disclosures may be asked to come forward as a witness.

The school will not tolerate any harassment or victimisation (including informal pressure) and will take appropriate action to protect employees when they raise a concern in good faith.

Under the Public Interest Disclosure Act 1998, where a staff member has made a 'qualifying disclosure' it is unlawful to dismiss or subject the employee to any detriment as a result of the disclosure. A 'qualifying disclosure' means any disclosure of information which, in the reasonable belief of the employee making the disclosure, tends to show one or more of the following:

- a criminal offence has been committed, is being committed or is likely to be committed
- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject
- a miscarriage of justice has occurred, is occurring or is likely to occur
- the health or safety of any individual has been, is being or is likely to be endangered
- the environment has been damaged, is being damaged or is likely to be damaged

- information tending to show any matter falling within any one of the preceding points has been, is being or is likely to be deliberately concealed.

In addition, a person making a disclosure is protected in law provided they:

- Do so in the public interest
- Do so to an appropriate person e.g. their line manager, Head of Department, The Head, Wishford CEO (Sam Antrobus) or a relevant external person such as the Local Authority Designated Office.
- Reasonably believe that the information disclosed and any allegation contained in it, are substantially true.

#### 4 Untrue Allegations

If an employee makes an allegation in good faith, but it is not substantiated, no action will be taken against the whistleblower. However, where an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

#### 5 How to Raise a Concern

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to their line manager, the Head, or to the Proprietor where the concern relates to the Head. Such concerns will then be treated in accordance with the procedure set out in the Safeguarding Policy.

All other concerns should also be raised with the Head. This can be verbally or in writing. The person who receives the report will decide on the next course of action, which, if the suspicion seems well founded, will involve contacting the Proprietor. However, if the concern involves the Head, or is of a sensitive nature, the concerns may be raised directly with the Proprietor.

If the concerns involve the proprietor they should be raised directly with the Wishford Board at the Head Office address

A meeting will be arranged to discuss your concern as soon as possible. You may bring a colleague or union representative with you to any meetings under this procedure. Anyone attending must respect the confidentiality of your disclosure and any subsequent action. You may be required to attend additional meetings to provide further information as the concerns are investigated.

Any concern will be thoroughly investigated. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation.

No one who reports a genuine concern in good faith needs to fear retribution. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body :

- where exceptionally serious circumstances justify it;
- that the school would conceal or destroy relevant evidence
- where they believe they would be victimised by the school
- where the Secretary of State has ordered it.

Staff wishing to raise a concern anonymously may also raise issues directly with the Proprietor using the Wishford website: [www.wishford.co.uk/whistleblowing](http://www.wishford.co.uk/whistleblowing)

The earlier the concern is raised, the easier it is to take action. Although an employee will not be expected to prove beyond doubt the truth of the allegation, they will need to demonstrate that there are reasonable grounds for their concern.

27.1 Staff wishing to discuss their concerns in confidence with an independent third party may contact the [NSPCC whistleblowing helpline](http://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/). Staff can call: 0800 028 0285 - line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: [www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/](http://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/)

#### 6 How the School Will Respond

Concerns relating to the behaviour of a member of staff toward a pupil will be treated in accordance with the procedure set out in the Safeguarding Policy.

All other concerns will be investigated and the School will respond to the person raising the concern (unless done so anonymously).

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations, which fall within the scope of specific procedures (e.g. Safeguarding or Grievance issues), will be referred for consideration under those procedures.

Where appropriate, the matter raised may be investigated by the Head, the Deputy Head or the Proprietor, depending on the nature of the issue.

Once an investigation has been conducted and conclusions reached, the Head or Proprietor will implement whatever steps they deem necessary to address the issue. The whistleblower will normally be informed of the outcome of the investigation, subject to the requirement to keep certain information confidential.

#### **7 How the Matter Can be Taken Further**

If the whistleblower is not satisfied with any action taken there is a right to take the matter further. The following are possible contact points:

- relevant professional bodies or regulatory organisation
- the Police.

If the matter is taken outside of the School, confidential information or information that is legally protected must not be disclosed. In accordance with the Staff code of conduct, contact with the Press should not be made.

#### **8 Approval & Review**

This policy was approved by the Proprietor. It will be reviewed every two years or as necessary following a change in regulation.



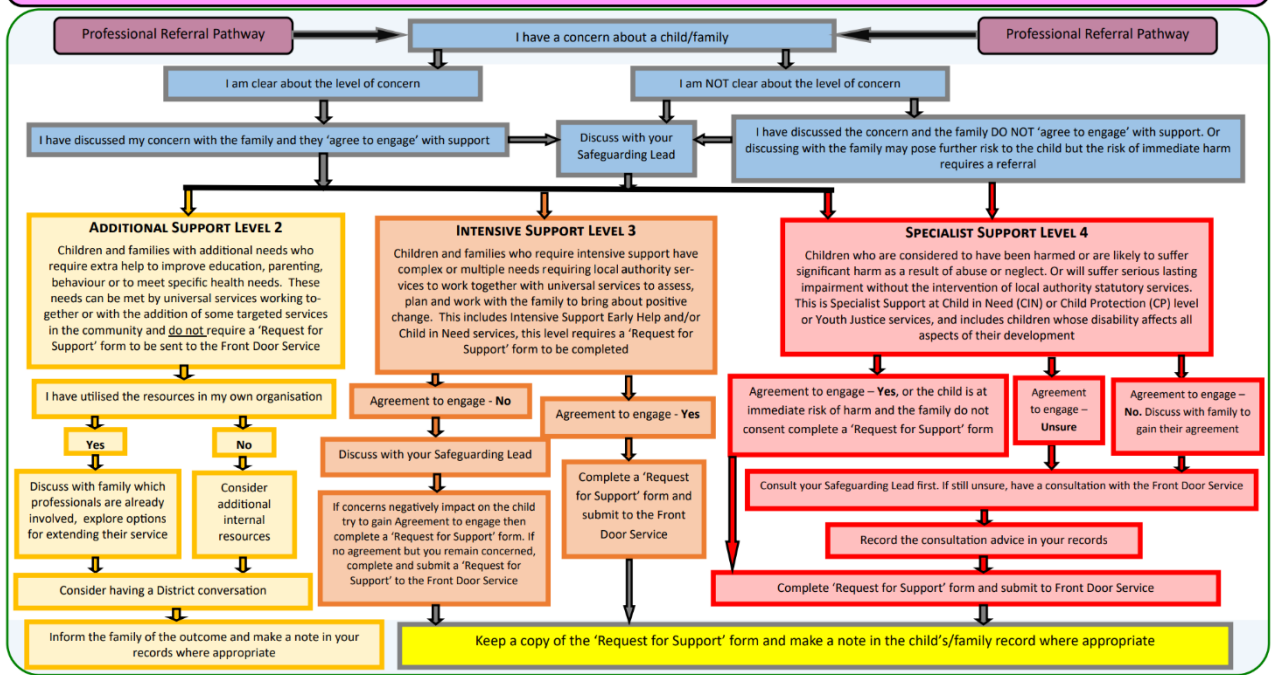
Signed: Sam Antrobus  
Chairman

# ANNEX A - LSCP INFORMATION AND FLOW CHART

UNIVERSAL SUPPORT LEVEL 1	ADDITIONAL SUPPORT LEVEL 2	INTENSIVE SUPPORT LEVEL 3	SPECIALIST SUPPORT LEVEL 4
<p><b>Child or Young Person—Indicators</b></p> <ul style="list-style-type: none"> <li>My attendance at school/college/training is above 90%</li> <li>There are no concerns about my home/school link</li> <li>There are no barriers to my learning and no concerns about my cognitive development</li> <li>There are no concerns about my behaviour</li> <li>I am able to discriminate between 'safe' and 'unsafe'</li> <li>I am able to understand right from wrong and act appropriately</li> <li>I have a positive sense of self, with no concerns about my forming relationships</li> <li>I have stable and affectionate relationships with my parents/carers</li> <li>I am physically healthy and my development checks are up to date</li> <li>I have an adequate and nutritious diet, regular dental and optical checks</li> <li>There are no concerns about my mental health</li> <li>There are no concerns about my attitude to drugs or alcohol</li> <li>There are no concerns about my use of technology</li> <li>I live in adequate housing and in a safe and secure environment</li> <li>I have a positive sense of my abilities</li> <li>I have positive relationships with my peers</li> <li>I have good core relationships with my siblings</li> </ul> <p><b>Parents / Carers</b></p> <ul style="list-style-type: none"> <li>My parents/carers can meet my needs, including taking me to school and all my health appointments</li> <li>My parents/carers provide me with guidance and boundaries to support my development</li> <li>My parents/carers provide me with secure and caring parenting</li> <li>My parents/carers are able to manage my behaviours</li> </ul> <p><b>Risks to me outside my home</b></p> <ul style="list-style-type: none"> <li>I am safe at home and outside in my community</li> </ul>	<p><b>Child or Young Person—Indicators</b></p> <ul style="list-style-type: none"> <li>I occasionally truant or have absences from school</li> <li>I have had some fixed term exclusions</li> <li>I have started to go missing, or been absent from school or home</li> <li>I have not developed good attachments/relationships</li> <li>I am a young carer with some responsibilities at home</li> <li>I am a teenage parent and I require some low level support</li> <li>I am not reaching my developmental milestones</li> <li>I have language/communication difficulties</li> <li>I need some low level support due to a diagnosed disability or sensory impairment</li> <li>I am showing early signs of associating with peers who are involved in crime or anti-social behaviour</li> <li>I am showing early signs of instigating or experiencing problematic sexual behaviour and language</li> <li>I have low level mental health or emotional issues or self harm</li> <li>I am saying I want to 'run away'</li> <li>I have disruptive/challenging behaviours</li> <li>I am at risk due to low level/emerging neglect</li> <li>I am home educated and there are concerns about my welfare</li> <li>I am negatively affected by difficult adult/family relationships</li> </ul> <p><b>Parents / Carers</b></p> <ul style="list-style-type: none"> <li>My family is impacted by poverty affecting their access to appropriate services/affecting my development</li> <li>My family home is in a poor state of repair, impacting on my health/development, or there is serious level of overcrowding</li> <li>My family are facing eviction/statutory homelessness</li> <li>My parents/carers struggle to meet my needs, or they place their own needs above mine</li> <li>My parents/carers struggle to provide me with good supervision or behaviour management</li> <li>My parents/carers often do not take me to my appointments which impacts negatively on my health or development</li> <li>My parents/carers health including physical/mental/learning disability or substance misuse, impacts negatively on my health or development</li> <li>My parents/carers require support to understand my disability or sensory impairment, and lack strategies to manage</li> <li>My parents/carers are at risk of entering the Criminal Justice System due to low level offending/anti-social behaviours</li> <li>My parents/carers used to be a Child in Care</li> </ul> <p><b>Risks to me outside my home</b></p> <ul style="list-style-type: none"> <li>I am being encouraged to use substances</li> <li>I am being encouraged to truant from school</li> <li>I am being encouraged to commit low level crimes or become involved in anti-social behaviour</li> <li>I may be at risk due to content, conduct or contact online</li> </ul>	<p><b>Child or Young Person—Indicators</b></p> <ul style="list-style-type: none"> <li>I have persistent unauthorised absence from school/NEET</li> <li>I am not on any school roll/I am Child Missing from Education (CME)</li> <li>I am at risk of, or I have been permanently excluded from school</li> <li>I am home educated, there are significant concerns for my welfare</li> <li>There is serious delay in me achieving my developmental milestones creating significant concerns</li> <li>I regularly go missing from home or school with no explanation</li> <li>I am at risk of suicide and my family need help to support me</li> <li>I am at risk of committing crimes and need preventative support</li> <li>I am a pregnant teenager with serious concerns about me/my unborn baby</li> <li>I am vulnerable to being sexually abused or exploited</li> <li>I am vulnerable to/exhibiting intimate partner abuse/violence</li> <li>I am vulnerable due to my drugs and/or alcohol use</li> <li>I have significant disabilities and require professional support</li> <li>I am a homeless child in need, including 16-17 years old</li> <li>I am a young carer whose caring duties are affecting my outcomes</li> <li>I have significant dental decay that has not been treated</li> <li>I am a child subject of a Court Ordered Report under s7 or s37 being completed by children's social care</li> <li>I am a child under an Education Supervision Order/Section 36 Children Act</li> </ul> <p><b>Parents / Carers</b></p> <ul style="list-style-type: none"> <li>I am unborn, the level of concern requires a pre-birth risk assessment</li> <li>I am being chronically neglected. Food, warmth and other basics are often not available. I live in very poor home conditions</li> <li>I am at risk due to the levels of domestic abuse in my family home</li> <li>I am at risk due to my parents/carers inability to parent consistently, and this is impacting negatively on my development</li> <li>I am at risk due to inappropriate child care arrangements</li> <li>I am at risk due to my parents/carers health or disability, or learning difficulty, or substance misuse, or their offending behaviour having a direct negative impact on me</li> <li>I am at risk due to my parents/carers own emotional or mental health difficulties, impacting on my health or development</li> <li>My family needs support to meet my disability needs</li> <li>I am Privately Fostered</li> <li>My family are being evicted despite professional/agency support</li> <li>I am at serious risk because my family may breakdown and I will be homeless, or I may have to be looked after outside my family network</li> </ul> <p><b>Risks to me outside my home</b></p> <ul style="list-style-type: none"> <li>I am being encouraged to become involved in a gang</li> <li>I am being encouraged to carry drugs/weapons</li> <li>I am at risk due to having contact with people who pose a risk of physical or sexual harm to children</li> <li>I am in a peer group that regularly goes missing</li> <li>I am at risk due to improper content, contact or conduct online</li> <li>I am vulnerable to criminal/sexual exploitation or radicalisation</li> </ul>	<p><b>Child or Young Person—Indicators</b></p> <ul style="list-style-type: none"> <li>I am not growing or developing properly with no medical reasons for this</li> <li>I am a non-mobile baby or non-mobile child with a bruise or an injury</li> <li>I am under 13 years of age and sexually active/have an STI/pregnant</li> <li>I have committed crimes / I am known to the Police</li> <li>I have been physically/sexually abused, including child sexual assault</li> <li>I have been kicked out of home, or I have left home as I am not safe there</li> <li>I have retreated socially, or I am struggling with my emotional/mental health and this is having a significant impact on me</li> <li>I have suicidal ideations/plans</li> <li>I have been abandoned or severely neglected by my parent/carer</li> <li>I am being significantly emotionally abused by my parent/carer/partner</li> <li>Others have significant concerns about my reliance on drugs or alcohol</li> <li>I am home educated, there are serious concerns for my safety</li> </ul> <p><b>Parents / Carers</b></p> <ul style="list-style-type: none"> <li>Meeting my needs as a severely disabled child has a significant impact on my family/parents/carers</li> <li>I am at significant risk because my carer cannot parent me properly</li> <li>I am at significant risk because my parents/carers are not supporting my medical or development needs</li> <li>I am at significant risk because my parents/carers are not able to protect me from known abusers in, or coming to, our family home</li> <li>I am at significant risk due to being left at home alone without adequate supervision or support</li> <li>I am at high risk due to my parents/carers mental health/substance abuse</li> <li>I am at high risk due to the level of domestic abuse in my family home</li> <li>I am an unborn at risk due to the pregnancy being concealed</li> <li>I am at risk because my parent/carer has abused/neglected another child</li> <li>A previous child has been removed from my parents/carers care</li> <li>I am at risk, my carer is exaggerating or causing symptoms/illness in me</li> <li>I am at high risk due to my parents/carers learning or physical disability</li> <li>I am at high risk due to my parents/carers cultural customs regarding Female Genital Mutilation (FGM)</li> <li>I am being forced to marry someone I don't want to</li> <li>I am at high risk due to my family's honour/cultural customs</li> <li>My parents may be benefitting from the risks to me outside my home</li> </ul> <p><b>Risks to me outside my home</b></p> <ul style="list-style-type: none"> <li>I am being trafficked</li> <li>I am experiencing peer on peer abuse which may involve use of/ or being forced to carry weapons in a group setting, i.e. gangs/counties lines</li> <li>I am at high risk of harm due to illegal or inappropriate content, conduct or contact online</li> <li>I am high risk of harm of being radicalised, abused or exploited through technology or inappropriate relationships, in person, or online</li> <li>I am being criminally/sexually exploited in a group setting, i.e. Gangs</li> <li>I am instigating or experiencing intimate partner abuse or violence</li> <li>I am at high risk of significant harm when I go missing from home</li> </ul>

**Risks or harm to me outside my home. A contextual safeguarding approach is applied**

This is when my experiences of harm are beyond my home, my parents/carers. It's when the different relationships that I form in the places, or spaces I spend time, like my neighbourhood, my school and online or within my peer group may feature violence and/or abuse. It often means that I am experiencing a level of coercive control that I don't recognise or accept as abusive relationships, which may undermine my parents/carers influence over me



**REMEMBER—** You only need to complete a Request for Support form if you are requesting support at Intensive or Specialist Support Levels 3 or 4. Please answer the questions when completing the online 'Request for Support' form, because the information you provide, will be used to assess which is the most appropriate level of support required. If it is not assessed to require support at Level 3 or 4, the form will be returned to you so that you can consider the Support Level 1 or 2 options. Information at [kscmp.org.uk/supportlevels](http://kscmp.org.uk/supportlevels)

## St Faith's Prep Flow Chart for Recording a Safeguarding Concern

### Why are you concerned?

For example

- Disclosure
- Child's appearance
- Behavioural change
- Witnessed concerning behaviour

### Immediately record your concerns

Follow the schools' procedure (recording electronically on CPOMS) before taking to the DSL.

- Clarify concerns if necessary (TED: Tell, Explain, Describe)
- Use child's own words
- Reassure the child

**Inform** the Designate Safeguarding Lead (Duncan Andrews) if he is not present inform the Deputy Safeguarding Leads (Amy Cavanagh or Dawn Melliard)

Consider: is the child in immediate risk of harm e.g. unsafe to go home?

#### DSL

- Consider KSCB Threshold document and procedures: [www.kscb.org.uk](http://www.kscb.org.uk)
- If unsure consult with 03000 41 11 11 out of hours (after 5pm weekdays and weekends 03000 419 191)
- If required complete a [Request for Support - Professionals \(kent.gov.uk\)](http://kent.gov.uk)

#### DSL

DSL to inform teacher who has made the concern how they will handle the concern. Remind the teacher that if they are unhappy with the response that anyone can made a referral or take consolation. If unsure consult with 03000 41 11 11 out of hours (after 5pm weekdays and weekends 03000 419 191). If required complete a [Request for Support - Professionals \(kent.gov.uk\)](http://kent.gov.uk)

DSL records decision making and action taken in CPOMS, including **discussions and decisions made including the rationale for these decisions.**

#### DSL

Monitor: what you will monitor e.g. behaviour trends, appearance – DSL to review termly.

Review and Re-Refer (if necessary)

At all stages the child's circumstances will be kept under review.  
The DSL/Staff will re-refer if required to ensure the **child's safety is paramount.**



## **ANNEX B - WHAT IS CHILD ABUSE?**

Types, Patterns, Recognitions and indicators of abuse and neglect

See the following advice - 'What to do if you're worried a child is being abused' -

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

and 'Practitioners Guide to Threshold Criteria for Children in Need and in Need of Protection' -

<http://www.readingLSCP.org.uk/information-professionals/threshold-criteria/>

and *Safeguarding Children from Abuse Linked to Belief in Spirit Possession*

<http://webarchive.nationalarchives.gov.uk/20130401151715/http://www.education.gov.uk/publications/eOrderingDownload/DFES-00465-2007.pdf>

**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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional community setting by those known to them or more rarely, by others. Child abuse may take place wholly online, or technology may be used to facilitate offline abuse. Abuse may be by an adult or adults or another child or children .

- **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.
  - **Fabricated or Induced Illness** - Physical harm caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
  - **Harm caused by culture, faith and beliefs** - is defined for the purposes of this policy as the belief that an evil force has entered a child and is controlling him. Sometimes the term 'witch' is used and is defined here as the belief that a child is able to use an evil force to harm others. There is also a range of other language that is connected to such abuse. This includes black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah, demons, and child sorcerers. In all these cases, genuine beliefs can be held by families, carers, religious leaders, congregations, and the children themselves that evil forces are at work. Families and children can be deeply worried by the evil that they believe is threatening them, and abuse often occurs when an attempt is made to 'exorcise', or 'deliver' the child. Exorcism is defined here as attempting to expel evil spirits from a child. The abuse usually occurs in the household or in a place of worship where alleged 'diagnosis' and 'exorcism' may take place.

**Female Genital Mutilation (FGM)** The partial or total removal of external female genitalia practiced in some cultures. Teachers cannot examine, but only raise concerns with the DSL. Guidance can be found here; <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>. Mandatory Reporting of FGM is in place and procedural information can be found here; <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>. It is recommended that you make a report orally **by calling the police using the non-emergency number 101**. This is illegal and a form of child abuse.

- **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 sexual assault by penetration (for example rape or oral sex) , and/or causing someone to engage in sexual activity without consent. 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. Sexual abuse also includes sexual violence and sexual harassment (see below)
- **Child-on-child sexual violence and/or harassment**
- It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and between children of any age or sex and is known as child on child abuse. This can also

occur between children from primary through to secondary stage and into colleges. It can occur online and face to face (both physically and verbally) and are never acceptable. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/ breasts/genitalia without consent, can still constitute sexual assault. The sexual abuse of children by other children is a specific safeguarding issue in education. is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the *SVSH* advice. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

- It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. Sexual violence and sexual harassment may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the *SVSH* advice. National Crime Agencies (CEOP) safety centre ins to keep children and young people safe from online sexual abuse and advice found and a report can be made on their website.
- **Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.
- **Child sexual exploitation (CSE)** - involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.
- **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 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 and the fact that a child is being exploited.
- **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.

- **Lesbian, gay, bi, trans or queer ("LGBTQ"):** The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. When supporting a gender questioning child, the school takes a cautious approach as there might be an impact on social transitioning and the child may have wider vulnerabilities. We endeavour to provide a safe space for LGBTQ children to speak out or share their concerns with trusted members of staff. We consider the range of individual needs, in partnership with parents.
- **Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.
- **Child abduction and community safety incidents:** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence it is important they are given practical advice on how to keep themselves safe. Further information: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).
- **Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information useful for parents and carers.

Further information on the following specific safeguarding issues can be found on the TES website and the NSPCC website. Broad government guidance is also available via the GOV.UK website.

- Forced Marriage
- Honour-based abuse (HBA)
- Domestic Violence (This includes where they see, hear, or experience its effects and this reflects the position under Operation Encompass KCSIE '24)
- Gender based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Sexting
- Teenage relationship abuse
- Trafficking
- Gangs

### **Signs and Symptoms of Child Abuse and/or neglect**

These are some of the signs and symptoms and types of behaviour which may indicate that a child is being abused or neglected. In themselves they may not be proof of abuse, but they may suggest abuse if a child exhibits several of them or if a pattern emerges.

### **Possible Signs of Physical Abuse**

- Unexplained injuries or burns, particularly if they are recurrent
- Refusal to discuss injuries
- Improbable explanations for injuries
- Untreated injuries or lingering illness not attended to
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear of returning home or of parents being contacted
- Fear of undressing
- Fear of medical help
- Aggression, bullying
- Over-compliant behaviour
- Running away
- Significant inexplicable changes in behaviour
- Deterioration of work
- Unexplained pattern of absence, which may serve to hide injuries

#### **Possible signs of Fabricated Illness**

- The only person noticing the symptoms is the parent or carer
- Exaggerating or fabricating symptoms to suggest the presence of an illness
- Repeatedly being absent for apparent medical reasons

#### **Possible signs of harm caused by culture, faith or beliefs**

- Beating, shaking, burning, cutting, stabbing, semi-strangulation, tying up the child, rubbing chilli peppers or other substances on the child's genitals or eyes or placing chilli peppers or other substances in the child's mouth
- Not allowing the child to eat or share a room with family members or threatening to abandon them
- Telling a child that they are possessed
- Failure to ensure appropriate medical care, supervision, regular school attendance, good hygiene, nourishment, clothing

#### **Possible signs of neglect**

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at school
- Low self-esteem
- Poor social relationships
- Compulsive stealing or scrounging
- Constant tiredness

#### **Possible signs of sexual abuse**

- Bruises, scratches or bite marks on the body
- Sexual awareness inappropriate to the child's age - shown, for example, in drawings, vocabulary, games etc.
- Attempts to teach other children about sexual activity
- Refusing to stay with certain people or to go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends

#### **Possible signs of emotional abuse:**

- Low self-esteem
- Changes in behaviour

- Withdrawal
- Extreme aggression or passivity
- Air of detachment - 'I don't care'
- Mistrust of adults
- Over-compliance
- Social isolation
- Frequent tummy pains and other pains
- Repression
- Depression
- Self-inflicted injuries
- Running away
- Reluctance to go home
- High level of attention-seeking behaviour
- Flinching from contact
- Sudden speech disorders

**Possible signs of bullying:** (These signs must be investigated and are deemed unacceptable. Their legal threshold must be understood and the position of vulnerable children, including those with SEN/D, acted upon in accordance with this policy and local authority guidelines.)

- Physical pushing, kicking, hitting and punching
- Verbal name calling, sarcasm, spreading rumours, humiliation and continuous ignoring of individuals
- Racial taunts, taunts to pupils with SEND, graffiti and gestures
- Sexual and abusive comments and unwanted physical contact
- Abusive telephone calls, text messages or e-mails
- Banter which is threatening to another child

Further information can be accessed via the NSPCC's child protection fact sheet "Signs of Abuse"

([www.nspcc.org.uk/signsofabuse](http://www.nspcc.org.uk/signsofabuse))

## OTHER TYPES OF ABUSE OF CURRENT CONCERN

### Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

All children can be at risk from Child Sexual Exploitation. Not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present. The guidance on CSE is non-statutory.

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Practitioners should not rely on 'checklists' alone but should make a holistic assessment of vulnerability, examining risk and protective factors as set out in the statutory guidance Working Together.

Sexual exploitation can have links to other types of crime. These include:

- Child trafficking;
- Domestic abuse;
- Sexual violence in intimate relationships;
- Grooming (including online grooming);
- Abusive images of children and their distribution;
- Drugs-related offences;
- Gang-related activity;
- Immigration-related offences; and
- Domestic servitude.

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;

- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

#### Actions:

- Use missing persons approach if appropriate
- Report continuous absence of ten days
- Follow procedures around concerns
- Victims can be of any age, gender, ethnicity or nationality. Look for signs of malnourishment, bruising or lack of required paperwork.

#### **Children with family members in prison**

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information to support staff working with offenders and their children, to help mitigate negative consequences for these children.

#### **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 or the community, including female genital mutilation (FGM), forced marriage and practises such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse and should be escalated as such.

#### **Forced Marriage**

Is illegal and a form of child abuse. Since February 2024 it is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday even if violence threats or coercion is not used. This applies to non-binding, unofficial marriages as well as legal marriages.

#### **Preventing Radicalisation**

Protecting children from the risk of radicalisation is part of the school’s wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse We will intervene where possible to prevent susceptible children being radicalised, which is defined as 'the process of a person legitimising support for, or use of, terrorist violence.

As with all other forms of abuse, staff should be confident in identifying pupils at risk and act proportionately. We will work with other partners including the Channel Panel. The DSL is appropriately trained and be able to offer advice, support and information to other staff.

We will carry out an appropriate risk assessment following consultation with local safeguarding partners of the potential risk in the local area which are discussed with the Heads and Wishford Governance to ensure the school’s safeguarding arrangements are robust to help prevent and protect children from being drawn into terrorism.

Further information on Preventing Radicalisation -. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

#### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (\*Close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

The school will follow the legal requirements of reporting as set out by the LSCP

## Dealing with issues relating to parental responsibility

<https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility>

### Domestic Abuse

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy

### Sexual Violence & Sexual Harassment

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. As set out in Part one of this guidance, schools and colleges should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships

You should read Part five alongside the Departmental advice: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges it contains further detailed information on:

- what constitutes sexual violence and sexual harassment,
- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools and colleges,
- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment, and
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

### Children with sexually harmful behaviour



Research suggests that up to 40 per cent of child sexual abuse is committed by someone under the age of 18. If an allegation relates to harmful sexual behaviours, if possible, the disclosure will be managed with two members of staff present preferably one being the DSL or a DDSL.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour should speak to the DSL as soon as possible.

#### **ONLINE SAFETY SUPPORT**

[www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)

[national crime agency education programme -](#)

[www.saferinternet.org.uk](http://www.saferinternet.org.uk)

[www.internetmatters.org](http://www.internetmatters.org)

[www.pshe-association.org.uk](http://www.pshe-association.org.uk)

[www.educateagainsthate.com](http://www.educateagainsthate.com)

[www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)

## ANNEX C - STAFF BEHAVIOUR AND CODE OF CONDUCT/STAFF BEHAVIOUR POLICY

In general, pupils should be encouraged to discuss with their parents or guardians issues that are troubling them. It may be appropriate to suggest that a pupil sees their tutor.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Staff should avoid taking one pupil on his/her own in a car. **If this occurs a written record must be kept**

### **Confidentiality & Information Sharing**

The over-riding principal is that the welfare of the child is paramount. Privacy and confidentiality must be respected where possible, provided that doing so does not leave a child at risk of harm.

Staff and other adults who have a concern about a child have a responsibility to share the relevant information with the Designated Safeguarding Lead and/or **Deputy Safeguarding Leads**, who may in turn share that information with other professionals. Sensitive information should be shared with the minimum number of people possible in order to properly investigate and resolve the concern.

Staff should not promise to keep secret information given to them by a child, but should explain that they will pass the information only to those who need to know and can help.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People and Carers* supports staff who have to make decisions about sharing information. The proprietor recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the school, local authorities, children's social care, the safeguarding partners and other agencies as required.

The following "golden rules" are taken from Government guidance:

- Remember that the Data Protection Act is not a barrier to sharing information. It provides a framework to ensure that personal information about living persons is shared appropriately. If in doubt about what can be shared speak to the DSL.
- Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
- Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
- Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. If you decide not to share, then record why.

### **Mobile Phones and cameras**

Our school believes that keeping children safe is of paramount importance. We also seek to ensure that everyone in the school is safeguarded against allegations and works to high standards of professionalism. Practitioners, teachers, volunteers, students and other visitors to the school, who will be in areas where children are present, are asked to switch off their mobile phones and to keep them in their bag or pocket as appropriate. In the EYFS all mobile devices are locked away and not accessed during the school day when children are present

The school provides mobile phones for trips and cameras for taking photographs when necessary (staff portfolios whilst training, evidence of pupil progression in EYFS).

Mobile phones should not be used when supervising or teaching children except in cases of emergency. Images of children must not be taken or stored on any personal mobile phone. If a phone/camera is to be used for school blogs or Twitter whilst on educational visits, permission must be obtained from the Head and reference to their use and subsequent safety of data must be referred to on the trip risk assessment. Images must be deleted as soon as they have been used and not stored on the phone or camera.

Photography can be used for recording achievements, for records and for other school use. However, only school cameras can be used to photograph children. Images can only be stored on school, password protected computers and then must be deleted from the camera immediately and especially before the camera leaves the premises on an educational visit.

Consent will be obtained from parents in order for photographs to be taken and used for evidence or recording achievements. All staff are aware of those children for whom permission has not been granted. Any photography or videoing of children will be done by staff/parent/carers and must always take place in full view of others. Cameras and mobile phones are not permitted in toilet areas or where children are changing.

### **Communication with Pupils**

Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use one of the school's telephones and email using the school system. They should not communicate with pupils using social networking sites, even on educational matters, but should use official email and networking sites sanctioned by the school. Staff should be circumspect in their private use of social networking sites **and - should not have pupils as contacts. Staff should exercise caution in having parents as social media contacts**) and must not discuss school business or school issues on their personal social networking site or risk breaching confidentiality about the pupils. The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The school mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip.

### **Physical contact with pupils**

There is an absolute ban on the use by any member of staff of any form or threat of corporal punishment. This includes any physical contact which is deliberately intended to punish a pupil, or any action which is primarily intended to cause pain, injury or humiliation.

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or of the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSL informed and, if appropriate, a copy placed on the pupil's file.

### **Physical Restraint (Known as Positive Handling)**

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself, another or to property, prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during a teaching session or otherwise or committing an offence and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL who will decide what to do next. Where this relates to the school's nursery/EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.

### **Transporting pupils**

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied

transportation of pupils unavoidable, the journey should be made known to a senior member of staff. A written record should be kept of any such journeys.

Use of physical interventions:

- There is an absolute ban on the use by any member of staff of any form of corporal punishment. This includes any physical contact which is deliberately intended to punish a pupil, or any action which is primarily intended to cause pain, injury or humiliation.
- It is important to allow children to do what they can for themselves, but depending on age and circumstances it may be necessary for some physical contact to take place; (e.g. a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves, running into the road etc.),
- Section 93 of the Education and Inspections Act 2006 enables school staff to use 'reasonable force' to prevent a pupil from :
  - a. committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil);
  - b. causing personal injury to, or damage to the property of, any person (including the pupil himself); or
  - c. prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during the teaching session or otherwise.
- School staff may also be empowered to carry out physical searches for weapons, illegal drugs, pornography etc. Actions by school staff must at all times be in accordance with guidance and procedures. In the event of searches or physical restraint being needed, parents will be informed the same day.

**ANNEX D - CHRONOLOGICAL RECORD OF CONVERSATIONS, OBSERVATIONS AND PHONE CALLS  
RELATING TO THE SAFETY AND PROTECTION OF CHILDREN**

Form A - Draft Recording Form for Safeguarding Concerns

Name of Child		
Gender	Age	Date of birth

Your name	Position	Date and time of incident

Name and details of person raising concern (if applicable)
Description of incident or circumstances concern including (i) child's perspective (verbatim where possible); (ii) details of anyone alleged to have caused the incident or concerns; and (iii) details of any witnesses or others who share the concerns

Date and time brought to attention of DSL/Head/Proprietor	Brought to whose attention
Signed	Date and time

**This form should immediately be passed to the Designated Safeguarding Lead ("DSL"), or the Head/Proprietor as appropriate**

**Form B - DSL follow up form (Insert school logo)**

Time form received by DSL:

Action taken by DSL:

Referred to...?

Attendance	Police	CADS	PSA	Community	Other	
Lead						Partnerships
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Date:

Time:

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pastoral team	Teacher	Child	Person who recorded disclosure

Further Action Agreed:

*e.g. School to instigate a Family Support Process, assessment by Children's Services*

Full name:

DSL Signature:

Date:

## **ANNEX E - DEFINITIONS: THE LANGUAGE OF SAFEGUARDING AND CHILD PROTECTION**

**Child/Children** - Everyone under the age of 18.

**Safeguarding** - Safeguarding and promoting the welfare of children is defined 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 the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provisions of safe and effective care
- Taking action to enable all children to have the best outcomes. Taking into account local context.

**Child Protection** - Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Safeguarding, in addition to child protection, encompasses issues such as pupil health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse. These areas have specific policies and guidance which should be read in conjunction with this document.

**Significant harm** - The Children's Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in the best interests of children. There are no criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm require discussion with the statutory agencies.

**Early Help** - Providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. It is about providing support quickly whenever difficulties emerge to reduce the impact of problems.

**Responsibilities** - The responsibility for child safeguarding falls on everybody who is employed at the school. All adults who work at this school are expected to support the school's Child Protection Policy, with overall responsibility falling upon the

**CAF** - Common Assessment Framework an early help inter-agency assessment. It offers a basis for early identification of children's additional needs, the sharing of this information between organisations and the coordination of service provision. Early help assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The findings from the Common Assessment may give rise to concerns about the child's safety and welfare. In these circumstances, it should be used to support a Referral to Children's Social Care: however, undertaking a CAF is not a pre-requisite for making a referral.

**CADS** - Children's Advice and Duty Service

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

**Parent** - Refers to birth parents and other adults who are in a parenting/carer role, for example step-parents, foster carers and adoptive parents.

**LADO**- a post in the local authority, to coordinate and manage allegations against staff.

**Social Care Direct** - Local Authority children social care/Family services.

**LSCP** - Local Safeguarding Children's Partnership

**DSL** - Designated Safeguarding Lead.

**Proprietor** - The person with overall responsibility for the governance of the school, Sam Antrobus.

## **ANNEX F - DSL JOB DESCRIPTION**

### **Manage referrals**

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required and within one working day
- Be aware that parent consent is not required for referrals to statutory agencies

### **Work with others**

Act as a point of reference with the three safeguarding partners

- Liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four KCSIE ) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- Liaise with staff (especially pastoral support staff, school medical teams, IT technicians and SENDCos) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice and expertise for staff.

### **Undertake training**

- The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role, including inter-agency training. This training should be updated at least every two years. The designated safeguarding lead and any Deputies should undertake Prevent awareness training.

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

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action, local authority children's social care referral arrangements.
- Have a working knowledge of how their local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- On induction and at regular periods, ensure each member of staff has access to and understands the school's child protection policy and procedures, the staff behaviour policy, the Behaviour Policy, the safeguarding response to children who are absent from education, the role of the designated safeguarding lead, the work of the three safeguarding partners, LCSB advice including Prevent and online safety, especially new and part time staff; Prevent training extends to all members of staff. All staff will be trained in managing a report of sexual violence and harassment in line with KCSIE 2024.
- Build a culture of 'it could happen here' and are alert to the specific needs of children in need, those with special educational needs and young carers;
- Understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners
- Are able to keep detailed, accurate, secure written records of concerns and referrals ( Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.)



- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. Abuse can be wholly online and can facilitate offline abuse.
- The DSL is responsible for the Online Safety of the children and the understanding of the filtering and monitoring systems and processes the school has in place
- Can recognise the additional risks that children with SEN and disabilities SEND face online, eg from online bullying, grooming and radicalisation and are confident they can support SEND children to stay safe online.
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

### **Raise Awareness**

The designated safeguarding lead should:

- Ensure the school child protection policies are known, understood and used appropriately, including awareness of the DSL's role, the whistleblowing policy, the early help process and the staff's role in it, their capacity to make referrals to children's social care and why, and what to do if a child tells them they are being abused or neglected;
- Ensure the school child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the local LSCP and the three safeguarding partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding. The DSL should give regular updates to staff as required.
- Child protection file - part of next section
- Where children leave the school ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as the DSL and the SENDCo are aware of the content of these files.

Consider if it is appropriate to share any information with the new school in advance of a child leaving; e.g. if it would allow the new school to continue supporting victim/alleged perpetrators of abuse.