



**Child Protection and Safeguarding Policy
September 2024**

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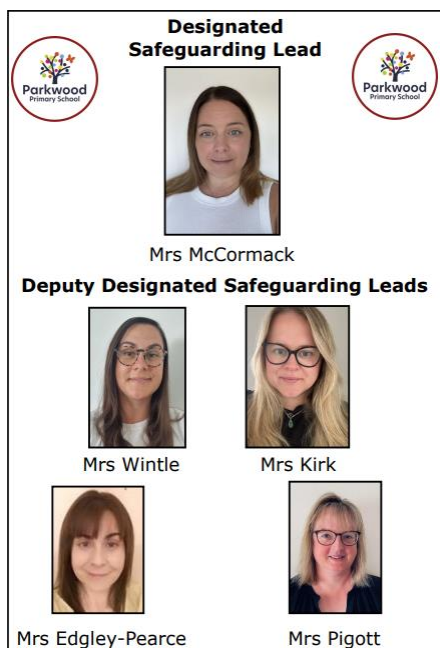
Leader		Lead Governor	
Lee McCormack		Kevin Kasaven	
Headteacher	Lee McCormack	Date	
Chair of Governing Body	Steve Pollard and Nabil Mugarbel	Date	

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Lee McCormack	lmccormack@hotmail.org.uk
Deputy DSL	Michelle Wintle Victoria Kirk Karen Pigott Amanda Edgley-Pearce	mwintle@parkwoodprimary.org.uk vkirk@parkwoodprimary.org.uk kpigott@parkwoodprimary.org.uk aedgley@parkwoodprimary.org.uk
Local authority designated officer (LADO)	Medway	01634 331065 LADO referral
Safeguarding Link Governor	Kevin Kasaven	kkasaven@parkwoodprimary.org.uk
Mental Health and Wellbeing Lead	Michelle Wintle	mwintle@parkwoodprimary.org.uk
Chair of governance partners	Steve Pollard Nabil Mugharbel	spollard@parkwoodprimary.org.uk nmugharbel@parkwoodprimary.org.uk
Channel helpline		020 7340 7264
Counter Terrorism Policing's website		https://actearly.uk/
Prevent Advice Line		0800 011 3764



Local Safeguarding Partners		
First Response & SPA	For urgent child protection concerns	01634 334466 (Monday to Friday from 9am to 5pm)
First Response/ Family Solutions	To request non-urgent support	Portal https://socialcare.medway.gov.uk/s4s/FormDetails/FillForm?formId=301
Out of Hours – Emergency Duty Team	For urgent child protection concerns	03000 419 191
Kent Police	Emergency situations	999 for urgent matters 101 for non-emergency matters
Local Authority Designated Officer	Allegations against adults in school	01634 331065 LADO referral
Education Safeguarding Service	Advice/Training/ Reviews	01634 331464 or 01634 331017 educsafeguarding@medway.gov.uk
Medway Safeguarding Children Partnership (MSCP)	Links to key Medway safeguarding documents, training and processes	01634 336 329 mscp@medway.gov.uk
Prevent Education Officer	Prevent advice & training	Sally.Green2@kent.gov.uk
National Contacts		
NSPCC Whistleblowing Helpline	Free advice and support to professionals about how CP issues are being handled in their own or other organisation.	0800 028 0285 help@nspcc.org.uk

Local Reporting Procedures

Child makes disclosure: immediately record your concerns

Follow the school's procedure

Do ...

Listen fully, be **supportive**, take the child **seriously**

Let the **child lead** the conversation

Reassure the child that they're **not in trouble** and will be **kept safe**

Ask **open questions** (TED questions)

Reflect back what they're **saying**

Be clear about what you'll do **next**

Ask the **child** if it's **okay** to **take notes**

Don't ...

Give the **child the impression** they're **creating a problem**

Make promises about keeping things **confidential**

Make **further investigations** yourself

Criticise the alleged perpetrator

Be **overly emotional**

✓ Think **who, what, where** and **when**

✓ Include as much detail as possible, including the **child's own words**

✓ Stick to the **facts**

✓ Make the report **as soon as possible**

Inform the Designated Safeguarding Lead

Lee McCormack: lmccormack@parkwoodprimary.org.uk

Designated Safeguarding Lead

- Consider whether the child has suffered, or is at immediate risk of, harm e.g., unsafe to go home
- If the child **is at imminent risk of harm**, make a telephone contact to **First Response: 01634 334466** (out of working hours contact **Out of Hours** on **03000 41 91 91**) and/or call **999**.
- If your concern is high, but the child is **NOT** at imminent risk, or for **Family Solutions referrals** use the **portal** (<https://socialcare.medway.gov.uk/s4s/FormDetails/FillForm?formId=301>)
- For early help, consider if internal support or referral to other agencies is appropriate
- Use the MSCP Threshold Guidance
- **No Names Consultation line: 01634 33 1662** (9:30 – 12:30 term time) for advice on non-urgent queries only.

Record decision making and action taken on CPOMs

Monitor

Be clear about:

- What **ACTION** you have taken at the time of reporting the concerns, and why?
- What you are monitoring e.g. behaviour trends, appearance etc?
- How long you will monitor?
- Who is responsible?
- Where, how and to whom you will feedback and how you will record?

At all stages the child's situation will be kept under review (*if necessary*)

The DSL/Staff will request further support if required to ensure the child's safety is paramount

If you are unhappy with the response DSL/Staff:

Follow MSCP escalation procedures

Follow Whistleblowing procedures

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance:

- <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> and [Working Together to Safeguard Children \(2018\)](#),
- [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)
- <https://www.gov.uk/government/publications/governance-handbook>

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- Mandatory reporting of Female Genital Mutilation: procedural information <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protection from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children mental and physical health or development
- Grow up with provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governance partners in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115111/Keeping_children_safe_in_education_2024.pdf) and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The expectations and responsibility in relation to filtering and monitoring of devices and usage by children.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CME) indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- That children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the DSL
- All staff will be made aware that the child's best interest must always be at the heart of every decision.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Please see Appendix One for details of our DSL. The DSL takes lead responsibility for child protection and wider safeguarding.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- To take a lead role in the responsibility for ensuring all staff understand the expectations and responsibility in relation to filtering and monitoring of devices and usage by children.
- To identify and consider the number of and age range of their children, those potentially at greater risk of harm and how to reduce the risk using monitoring strategies.

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Liaise with the headteacher to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

The DSL will also keep the headteacher (where the Head Teacher is not the DSL) informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and their deputies are set out in their job description.

5.3 The Governing Body

The governors approve this policy at each review, ensure it complies with the law. The chair of governors will hold the headteacher to account for its implementation.

The governing body will appoint a safeguarding governor to monitor the effectiveness of this policy.

The chair of governors will be supported by LADO in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 4).

The governing body will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.'

The governing body will review the filtering and monitoring provision at least annually.

All governing body members will read Keeping Children Safe in Education.

Section 15 of this policy has information on how the governing body are supported to fulfil their role.

5.4 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL/DDSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly including online safety.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

- Recording of any low-level concerns regarding staff and following the reporting process
- Early Years responsibilities
 - Ensuring the relevant staffing ratios are met, where applicable

6. Confidentiality

Please see Appendix One for approach to confidentiality and data protection with regard to safeguarding.

We acknowledge that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENDCO), are aware as required.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly, follow the local procedures for making a referral (Appendix one). **Although anyone can make a**

referral all referrals must go via and in conjunction with the DSL therefore staff are supported in throughout the process.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions (use TED questions: tell, explain, describe)
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Let the DSL know in person, write-up and then add the report to CPOMS.

Do ...	Don't ...	
Listen fully, be supportive , take the child seriously	Give the child the impression they're creating a problem	✓ Think who, what, where and when
Let the child lead the conversation	Make promises about keeping things confidential	✓ Include as much detail as possible, including the child's own words
Reassure the child that they're not in trouble and will be kept safe	Make further investigations yourself	✓ Stick to the facts
Ask open questions (TED questions)	Criticise the alleged perpetrator	✓ Make the report as soon as possible
Reflect back what they're saying	Be overly emotional	
Be clear about what you'll do next		
Ask the child if it's okay to take notes		

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education’s Keeping Children Safe in Education explains that FGM comprises ‘all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs’.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, **personally**. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above **does not apply** in cases where a pupil **is at risk of FGM** or **FGM is suspected** but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures. See appendix one for local procedures for this.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 14 illustrates the procedure to follow if you have any concerns about a child's welfare.

Speak to the DSL or DDSL first to agree a course of action.

If in exceptional circumstances the DSL or the DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team. Leaders can take further advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Early help (Family Solutions)

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or the DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governance partners can call to raise concerns about extremism with respect to a pupil.

You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a mental health concern

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

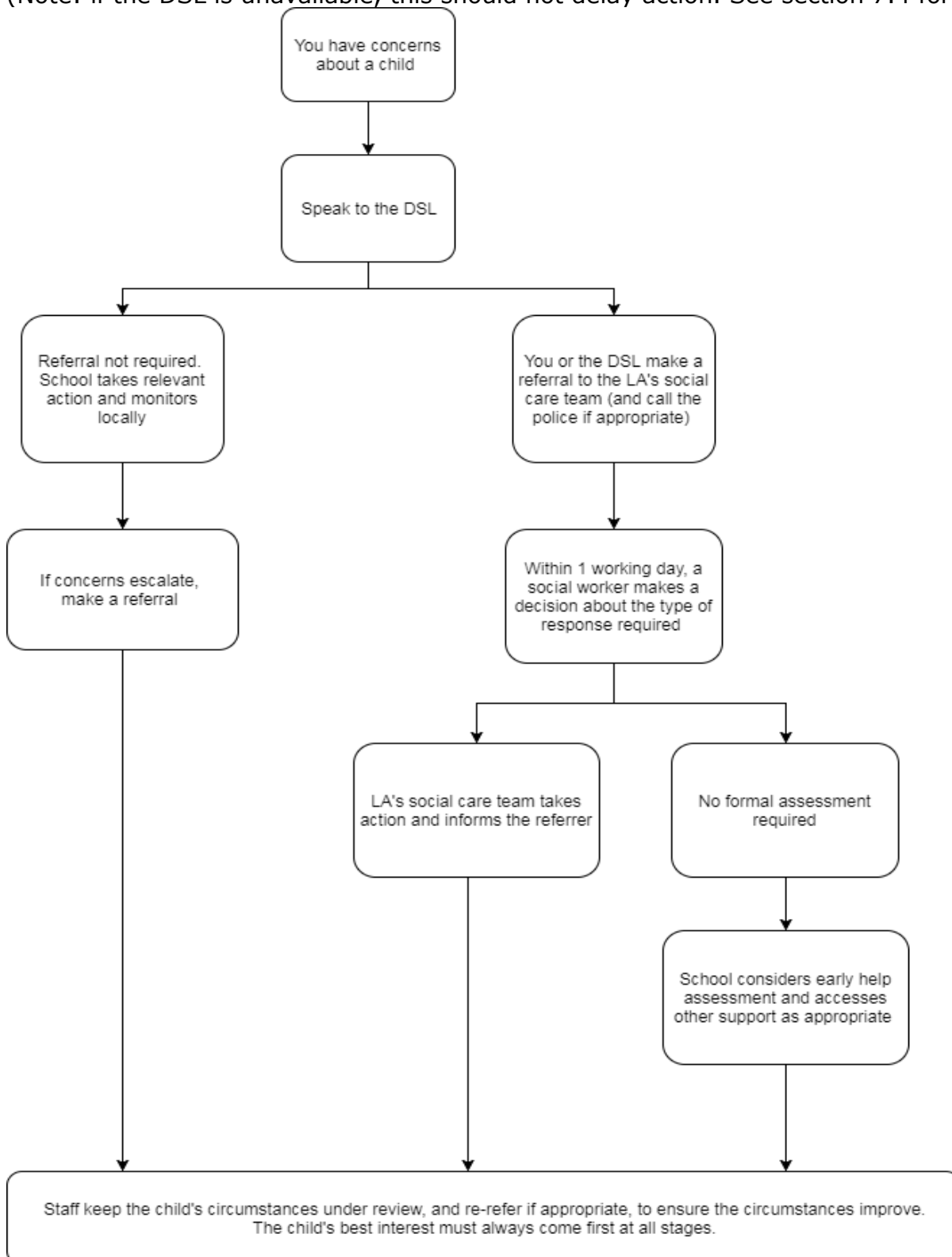
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note: if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to chair of governors or LADO.

The headteacher will then follow the procedures set out in appendix 4, if appropriate.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially

- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

7.9 Sexting

Approach based on guidance from the UK Council for Child Internet Safety for [all staff](#) and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police; please see appendix one for local arrangements

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images

- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

9. Pupils with additional barriers

Special Educational Needs and Disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Please see Appendix One for detail of extra pastoral support we offer for pupils with additional barriers.

10. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

11. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, (see Appendix One for their name and title who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#)).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

12. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

We will follow our Complaints Procedures for all other complaints.

13.3 Whistleblowing

Concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures can be raised using the Whistle-blowing policy.

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

15. Training

15.1 All staff

All staff members will undertake safeguarding, FGM and child protection, including online safety training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, National College, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Governance

All governors will receive annual training about safeguarding, prevent, FGM and online safety, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

A chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

15.4 Recruitment

As a school we have a culture that safeguards and promotes the welfare of children in our schools. We have adopted a robust recruitment procedure that deters and prevents people who are unsuitable to work with children from applying for to securing employment, or volunteering opportunities in our schools.

The recruitment policy should be followed. This policy fully details and explains the recruitment process.

See appendix 3: Safer recruitment and DBS checks.

Interview Panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Single Central Record

The school maintains single central record detailing checks carried out. SCR is monitored and checked by the Safeguarding Link Governor.

15.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Supervision within the school:

- Line management support
- DSL group support through DSL meetings
- HT/DHT supervision via 1-1 bespoke coaching

16. Monitoring arrangements

This policy will be reviewed **annually** by the DSL. At every review, it will be approved by the governing body.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Safer recruitment
- DBS
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices
- Whistleblowing
- IT Acceptable Use

Appendix 1: School Specific Roles and Responsibilities

The designated safeguarding lead

Our DSL is Lee McCormack (headteacher)

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

During out of school hours, Lee McCormack can be contacted using the following phone number and email address:

07889 368854

lmccormack@parkwoodprimary.org.uk

When the DSL is absent, the deputy DSLs will act as cover.

- Michelle Wintle (SENDSCO)
- Victoria Kirk (Deputy Headteacher)
- Karen Pigott (Assistant Headteacher)
- Amanda Edgley-Pearce (Assistant Headteacher)

If the DSL and deputies are not available, Emma Williams will act as cover (for example, during out-of-hours/out-of-term activities).

Designated teacher for Looked After and Previously looked After Children

We have appointed a designated teacher, **Michelle Wintle (SENDSCO)**, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

Confidentiality

We acknowledge that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENDSCOs) or the named person with oversight for SEND in colleges, are aware as required.

- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

Record-keeping

- Safeguarding records are kept electronically using CPOMs
- Records are kept secure through restricted access and two-step authentication. This ensures records are kept confidential and only those with good professional reason will be able to access them.

In addition:

- Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff
- Appendix 5 our policy of dealing with 'low-level concerns'

Making a referral to Children's Social Care, including for FGM

Local Reporting Procedures

Child makes disclosure: immediately record your concerns

Follow the school's procedure

Do ...

Listen fully, be **supportive**, take the child **seriously**

Let the **child lead** the conversation

Reassure the child that they're **not in trouble** and will be **kept safe**

Ask **open questions** (TED questions)

Reflect back what they're **saying**

Be clear about what you'll do **next**

Ask the **child** if it's **okay** to **take notes**

Don't ...

Give the **child the impression** they're **creating a problem**

Make promises about keeping things **confidential**

Make **further investigations** yourself

Criticise the alleged perpetrator

Be **overly emotional**

✓ Think **who, what, where and when**

✓ Include as much detail as possible, including the **child's own words**

✓ Stick to the **facts**

✓ Make the report **as soon as possible**

Inform the Designated Safeguarding Lead

Lee McCormack: lmccormack@parkwoodprimary.org.uk

Designated Safeguarding Lead

- Consider whether the child has suffered, or is at immediate risk of, harm e.g., unsafe to go home
- If the child **is at imminent risk of harm**, make a telephone contact to **First Response: 01634 334466** (out of working hours contact **Out of Hours** on **03000 41 91 91**) and/or call **999**.
- If your concern is high, but the child is **NOT** at imminent risk, or for **Family Solutions referrals** use the **portal** (<https://socialcare.medway.gov.uk/s4s/FormDetails/FillForm?formId=301>)
- For early help, consider if internal support or referral to other agencies is appropriate
- Use the MSCP Threshold Guidance
- **No Names Consultation line: 01634 33 1662** (9:30 – 12:30 term time) for advice on non-urgent queries only.

Record decision making and action taken on CPOMs

Monitor

Be clear about:

- What **ACTION** you have taken at the time of reporting the concerns, and why?
- What you are monitoring e.g. behaviour trends, appearance etc?
- How long you will monitor?
- Who is responsible?
- Where, how and to whom you will feedback and how you will record?

At all stages the child's situation will be kept under review (if necessary)

The DSL/Staff will request further support if required to ensure the child's safety is paramount

If you are unhappy with the response DSL/Staff:

Follow MSCP escalation procedures

Follow Whistleblowing procedures

Reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

Making a referral to Early Help

Should the Level 2 threshold level be reached for an Early Help referral (known as Family Solutions in Medway), use the following link:

<https://socialcare.medway.gov.uk/s4s/FormDetails/FillForm?formId=301>

<p>2. Early Help – Children with additional needs Has additional needs identified that can be met within identified resources through a single agency response and robust partnership working</p>	<ul style="list-style-type: none"> - Dental decay due to poor hygiene - Chronic/ recurring health problems - Concerns about emotional/ mental health issues - Concerns about impact upon children who are young carers - Poor or unstable parent/ child relationships - Concerns about being bullied or bullying behaviour - Poor housing & home environment impacting on child - Concerns about impact of community harassment/ discrimination - Risk of relationship breakdown/ inter-parental conflict - Concerns about domestic abuse and coercive control - Family bereavement - Concerns about pregnant mother with no safeguarding concerns - Concerns regarding internet safety - Concerns about teenage pregnancy - Housing tenancy at risk - Concerns about transient and avoidant families - Concerns of potential vulnerabilities to radicalisation
<ul style="list-style-type: none"> - Concerns about impact of absence/ truancy, exclusion from school - Concerns about isolated children not accessing services - Persistent poor behaviour in school and risk of persistent social exclusion - Mental health issues affecting developmental needs, incl. concerns about self-harm - Children frequently missing from home - Disability or additional special educational needs - Not reaching potential as is not in education, employment or training - Concerns about difficulty in achieving in education - Concerns about meeting developmental milestones - Missing health appointments/ delayed response in ensuring child's health needs met - Early signs of offending/ anti-social behaviour - Concerns about being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups - Concerns about vulnerabilities to Radicalisation and Extremism in person or online - Concerns about underage sexual activity/ inappropriate age related sexualised behaviours and consideration of vulnerabilities such as learning disability and SEN. - Concerns about early signs of drug/ alcohol misuse - Low level emotional & behavioural issues that may be linked to attachment and/or emotional development delay - Concerns about children who were previously in care, children who do not live with their birth parents i.e. adopted children, Special Guardianship Orders, Kinship Care. 	<ul style="list-style-type: none"> - Inconsistent care arrangements - Poor relationships impacting upon child's development - Low income/ poverty impacting upon child's welfare - Poor supervision by parent/ carer - Concerns about parent's own health needs impacting on child - Poor response to child's physical, emotional or health needs - Historic context of parents/ carers own childhood, ie. adverse childhood experiences - Controlled or stable substance misuse - Parents/carers are at risk of entering the Criminal Justice System due to offending/anti-social behaviours

Local Procedures for Referral and Escalation

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Reaching Level 3 threshold:

- If the child **is at imminent risk of harm, make** a telephone contact to **First Response: 01634 334466** (out of working hours contact **Out of Hours** on **03000 41 91 91**) and/or call **999**.
- If your concern is high, but the child is **NOT** at imminent risk, or for **Family Solutions referrals** use the **portal** (<https://socialcare.medway.gov.uk/s4s/FormDetails/FillForm?formId=301>)

<p>3. Statutory Social Care – Children with complex multiple needs Statutory service to address complex/ multiple needs or is in need of protection (include CIN)</p>	<ul style="list-style-type: none"> - Person posing a risk to a child - No recourse to public funds - Unborn child placed at risk, previous children or siblings removed - Severe and chronic dental decay - Imminent risk of family homelessness - 16/17 year old presenting as homeless - Domestic abuse where all unborn children and those under one are automatically at significant risk of harm and all children of other ages who are at risk of significant harm - Forced marriage, honour based violence, female genital mutilation - Allegation of harm by a person in a position of trust - Private Fostering
<ul style="list-style-type: none"> - Serious concerns about impact of significant and complex learning/ physical disability on child's welfare - Regular missed health appointments with evidence of acute negative impact on child's development - Chronic drug/ alcohol misuse impacting negatively on child's welfare/ development - Peer on peer abuse with significant negative impact - Significant harmful sexual behaviour including persistent evidence of inappropriate sexual knowledge and behaviour for age - Significant evidence of exploitation (e.g. sexual, criminal, gang affiliation and drug exploitation) - Significant evidence of high risk of harm of being Radicalised abused or exploited through technology or inappropriate relationships in person or online - Severe and complex mental health issues affective development needs, including significant self-harm - Non organic failure to thrive as to cause threat to life - Child/ young parent/ pregnancy under the age of 13/ or having sex (Statutory rape) - Child victims of modern slavery, human trafficking, involved in terrorist activity - Chronic risk of harm from consistently missing from home - Unaccompanied minors - Unexplained, non accidental, suspicious injury - Non mobile child with suspicious or unexplained bruising - Evidence of physical, emotional or sexual abuse or neglect 	<ul style="list-style-type: none"> - Parental learning or physical disability impacting upon child's welfare and safety - Significant concerns about substance misuse or mental health impacting on parenting - Fabricated or induced illness (Parent or carer fabricates symptoms or deliberately causes symptoms of illness in child) - Parent/Carer exhibiting disguised compliance - Persistent failure to meet a child's basic, physical and/or psychological needs - Imminent risk of significant harm due to poor supervision - Developmental milestones not being consistently met due to persistent failure of parenting - Persistent evidence of negative impact of parental/ carers relationship breakdown on the child - Parents/carers offending behaviour having a direct negative impact on parenting and risk to a child

Mental Health Concerns

- The school will ensure that all staff have an awareness of mental health problems and be aware that in some cases they can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.
- Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these experiences can impact on children's mental health, behaviour, and education.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour indicating a mental health problem or being at risk of developing one.
- If staff have a concern about a child's mental health, that is also a safeguarding concern, immediate action will be taken, following the reporting procedures in this policy.

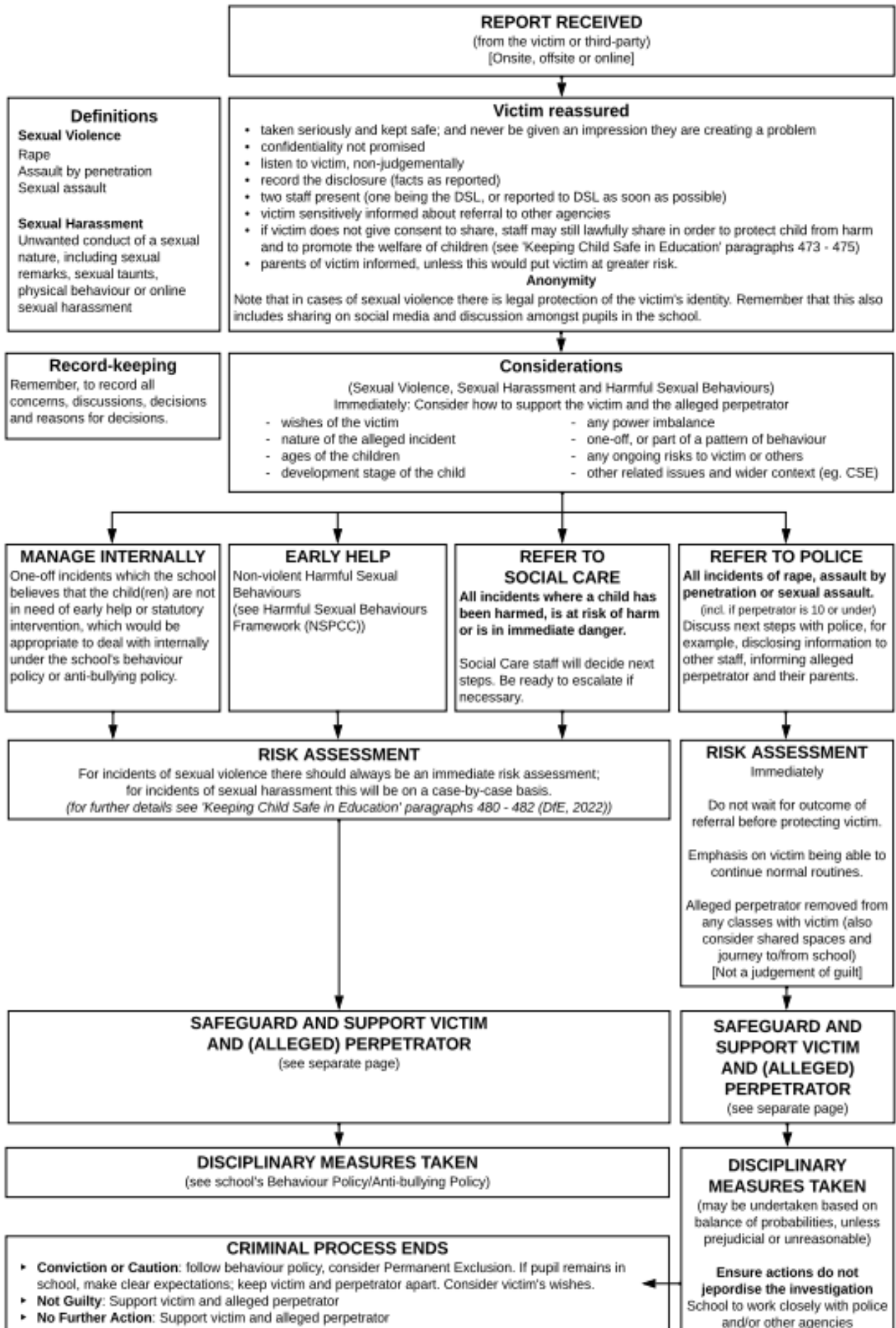
Further guidance is available from the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

Child-on-Child Abuse.

Ensure pupils know they can talk to staff confidentially by



***PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**



Referring to the police

If it is necessary to refer an incident to the police:

PS Raj Dusanjh Raj.Dusanjh@kent.police.uk

Pupils with additional barriers.

We offer extra pastoral support for pupils with additional barriers, including access to a family liaison officer and a trained senior mental health lead, Mrs Wintle.

Mobile phones and cameras

Pupils in Year 5 and 6 may need to bring phones onto school site if they walk to and from school independently. All pupils must hand their phone into their teacher as they line up. Phones will be stored securely by teachers and then distributed as pupils leave the line at the end of the day. Pupils must not take photographs on school premises.

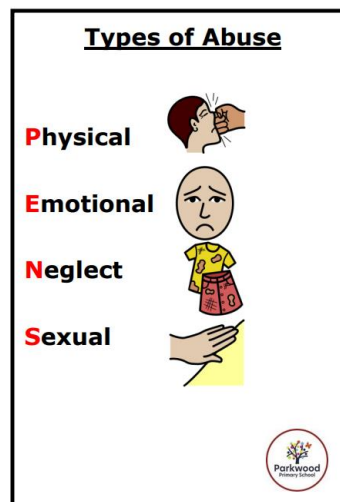
These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 2: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.



Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- 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.

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 3: Safer recruitment and DBS checks – policy and procedures

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

Adverts

All adverts will include a commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken. Safeguarding responsibilities of the post will be detailed as per the job description and personal statement.

Application Forms

Medway local authority forms will be used for recruitment. A curriculum vitae will not be accepted as part of the recruitment process. Shortlisted candidates will have to physically sign their application form if application was digital.

Shortlisting

Shortlisting will be carried out with at least two people. 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. The school will carry out an online search as part of the due diligence on the shortlisted candidates. All candidates will be informed of online searches.

Employment History and references

The purpose of seeking reference is to allow the school to obtain factual information to support the appointment decisions. We will seek references on all short-listed candidates, including internal candidates, before interview, this allows concerns raised to be explored further with the referee and taken up with the candidate at interview. We will scrutinise these and resolve any concerns before confirming appointments. **The references requested will ask specific questions about the suitability of the applicant to work with children.**

Interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Pre-appointment vetting check, regulated activity and recording information

New staff

When appointing new staff, we will:

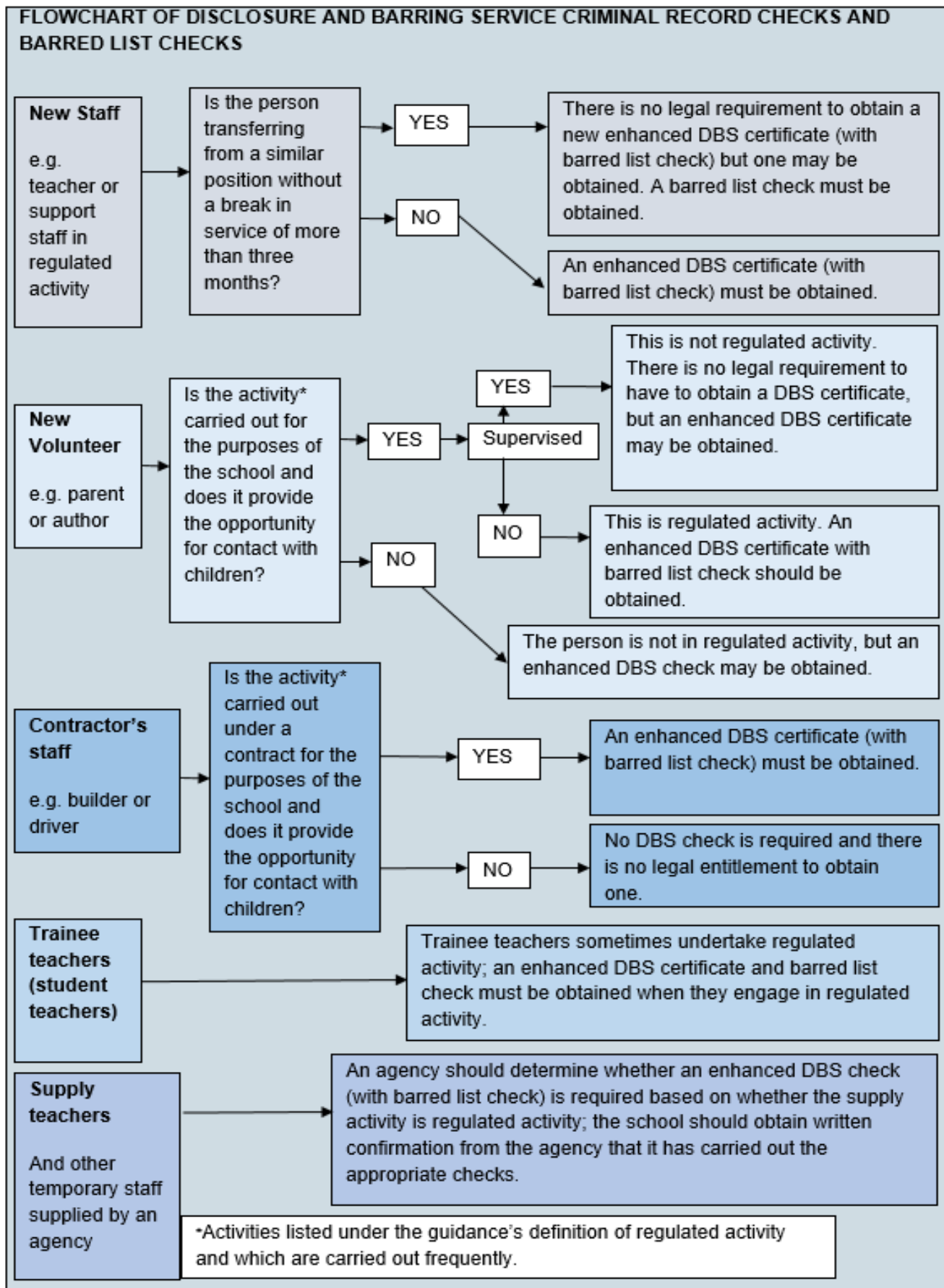
- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

Schools follow the Trust DBS policy and use the flow chart below. As a Trust all new employees, volunteers and contractors must have a DBS. Employees are encouraged to join the DBS Update Service. The Trust DBS policy details the renewal and review policy. Section 128 checks are completed and regularly reviewed at least on an annual basis.



Regulated activity means a person who will be:

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

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is. We will also check when a member of staff changes position e.g. promotion to a leadership position.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

We will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

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

Volunteers

We will:

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

Governance

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

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

However, due to the age of our children we would not normally use host families for accommodation.

Appendix 4: Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

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



It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The school have access to a Care First package through Medway HR. Trade Unions will also support their individual members..
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any



Care first
employee assistance solutions

Who are Care first?
Care first are a leading provider of professional counselling, information and advice offering support for issues arising from home or work. Care first employ professionally qualified Counsellors and Information Specialists, who are experienced in helping people to deal with all kinds of practical and emotional issues.

What does the service provide?

- Unlimited Freephone access 24 hours a day, every day of the year for personal and work related issues.
- Short term counselling and support by telephone and face to face (up to six one hour sessions per issue).
- Support and referral for longer term issues.
- Information services for any practical and day-to-day issues.
- Management support and referral services.
- On-line counselling, supporting articles and wellbeing advice.

How do I use the service?
You don't need to ask your manager to use Care first, just call **0800 174319** and you can speak to a professional counsellor [in confidence](#).

information and support 24/7
www.carefirst-lifestyle.co.uk

allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

Where the police are involved, wherever possible the academy trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

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

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

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

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Additional considerations for Out-of-Hours contracts for Organisations

If the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the school should follow their safeguarding policies and procedures, including informing the LADO.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Low level concern

Definition of a low-level concern:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Doesn't meet the threshold of harm or is not considered serious enough for the school to refer to the local authority.

SL responsibility when concerns don't meet LADO threshold

Actions:

DSL/Headteacher will take advice from Human Resources and follow internal capability procedures. This will include a confidential note on file and possibly professional words of advice.

Appendix 5: Low-Level Concerns

Introduction

The school take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff must inform the Head Teacher. Head Teacher will record the concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Deputy Head Teacher must be informed.

Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024.

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

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

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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

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

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

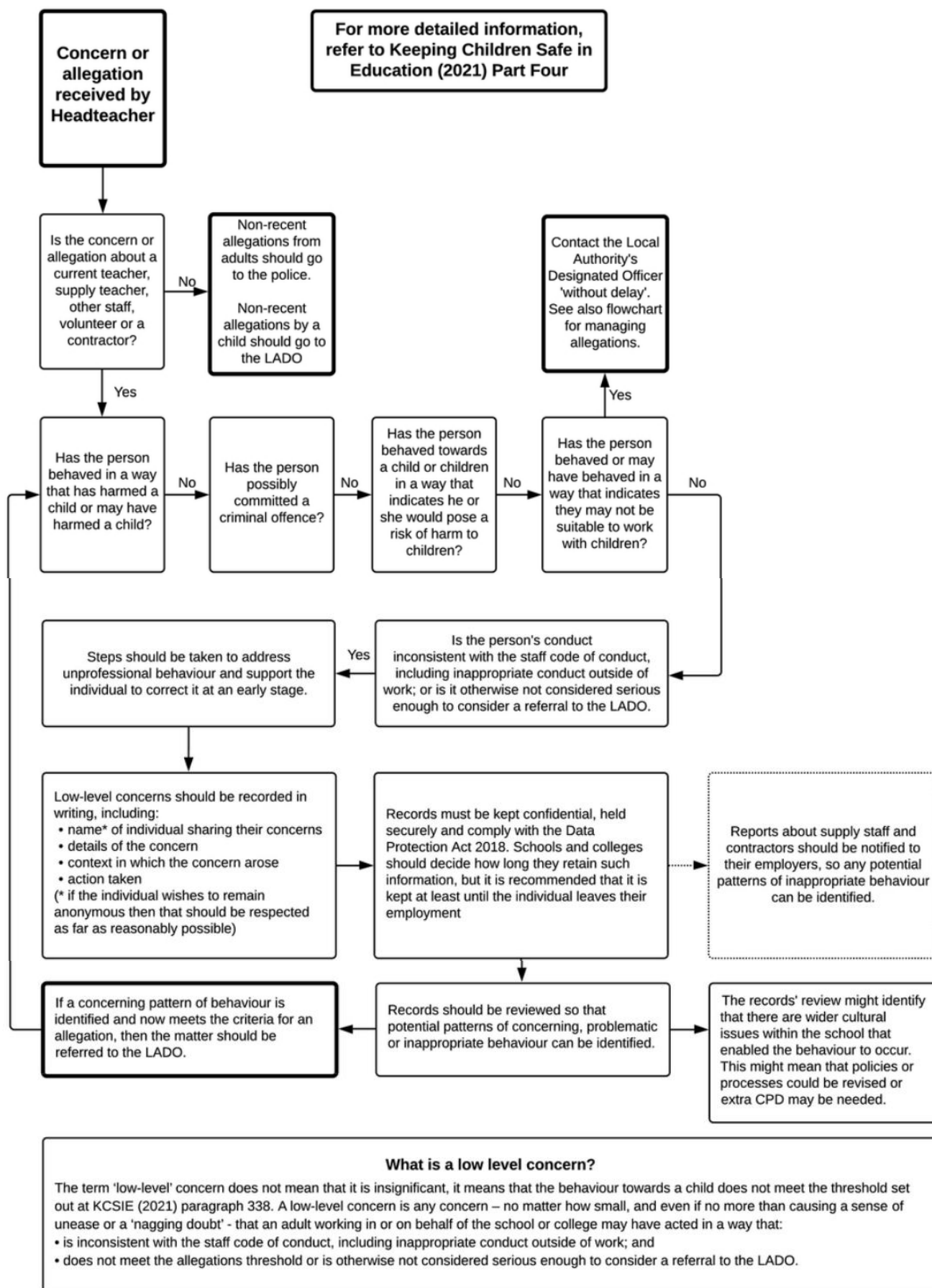
Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the Law.

Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team. Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures. Whenever staff leave the school, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to: (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

Process to follow when a low-level concern is raised:



Low-Level Record of Concern Regarding a Staff Member:

Name of adult writing this concern:	
Name of adult whom this concern is about:	
Date written:	
Signature:	
Please write your concerns below	

You should provide a concise record, including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible of any such concern and relevant incident(s) (and please use a separate sheet if necessary). Consider any contextual information that may be appropriate to know.

Appendix 6: Specific safeguarding issues

Children missing from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly for unexplained or prolonged periods and on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Elective Home Education (EHE)

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

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work with that LA, and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

The school must inform their LA of all deletions from their admission register when a child is taken off roll.

Remote Education

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be

persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

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

Domestic abuse

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

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. Children can be victims in their own relationships too.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#).

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

Homelessness

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

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

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

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

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

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

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

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. There are possible indicators

(<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners->

[vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting](#)) that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

Staff should **always** take action if they are worried.

Checking the identity and suitability of visitors

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

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the electronic system and wear a visitor's badge on a blue or grey lanyard.

Blue: no DBS, cannot be with children alone

Grey: DBS, can be with children alone.

Children are aware of the difference in the lanyards and reminder posters are displayed around the school:



Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Visitor safeguarding leaflets are also given out on entry to the school.



 Deanwood Drive,
 Rainham ME8 9LP
 01634 234699
 office@parkwoodprimary.org.uk
 www.parkwoodprimary.org.uk



SCHOOL VISITOR SAFEGUARDING GUIDE

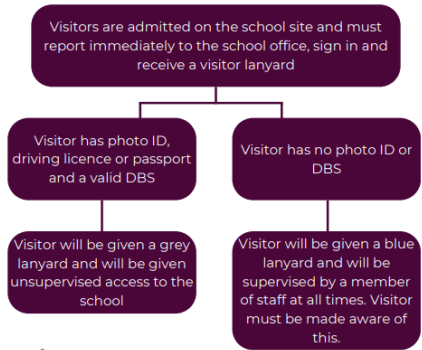
WELCOME TO PARKWOOD PRIMARY SCHOOL

We are committed to safeguarding and promoting the welfare of children. We ask that all staff, volunteers and visitors share this commitment. This leaflet contains important information about our expectations for visitors to the school so please take a few moments to read it.



Visitor Procedure

- All visitors must sign in at the school office.
- All visitors will be issued with an appropriate grey or blue visitor lanyard, which must always be worn whilst on school site. Our children recognise these and know what they mean.
- Mobile phones must be stored away in a safe place - not in classrooms. They must be switched off.
- All visitors must sign out at the school office and return their visitor lanyard when leaving the school site.



Everybody has a responsibility to keep all children under the age of 18 safe. This applies to school, home and online.

If you are worried about a child, you should contact one of the DSLs named in this leaflet immediately. The office staff will help you if you are not sure where to locate them.


If you are worried about the behaviour of an adult, you should speak to the headteacher immediately. If your concern is about the DSL/Headteacher, you must contact the LADO at the local authority (01634 331065).

Don't be worried that people will see your concerns as unimportant or interfering. Be reassured we will listen, not judge and will act appropriately to ensure the safety of our children.


If you think your child is at immediate risk or harm, you can call the police on 101 or 999 or call Medway MASH straightaway.

Monday to Friday 9.00am - 5.00pm: 01634 334 466
 Out of hours: 03000 419 191

Adults in School




My lanyard is **grey** as an adult. You may be with you throughout the day.




My lanyard is **blue** as it is ok for me to be with you. But I need someone here with me too.

It could happen here!



Be vigilant

It probably is happening here!



Be vigilant

Non-collection of children

If a child is not collected at the end of the school day (3.10pm), the school will:

- contact parents or carers
- call other contacts if parents and carers cannot be reached so an authorised adult can come and collect the child

Until the pupil is collected, they should stay in the school in the care of two members of staff. DSL should be alerted.

School staff and volunteers **should never:**

- take the child home with them
- transport the child home
- go in search of parents/carers.

If parents/carers are more than 15 minutes late, the child will be taken to join our wraparound care service. Parents/carers have until 4.00pm to make contact. If contact has not been made by this time, First Response at the local authority will be called.

If parents and carers have authorised someone else to collect the child, they may not always be aware the child is being collected late, so it's important to keep them informed if this happens.

Persistent lateness might indicate that a parent is struggling to meet their child's needs. All late collections should be logged on CPOMs. DSL should contact parents or carers outlining their concerns. This should be recorded as a safeguarding concern using CPOMs.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Alert a DSL/senior leader
- DSL/senior leader to notify parents if they are not already aware.
- DSL/senior leader to instruct a search of the school building by school staff.
- DSL/senior leader to instruct a search of the local area by school staff (park, precinct and woods).
- DSL/senior leader to instruct two members of the senior leadership team to walk/drive to the child's home address.
- If the child cannot be located within 15 minutes, DSL should call 999.

Online Safety

Children are taught about online safety as part of the curriculum that embeds online safety practices. This includes the safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

The Online Safety Policy addresses the 4 key categories of risk and defines our approach to online safety:

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

Reviewing online safety

Technology, and risks and harms related to it, evolve, and change rapidly. The school will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

Appendix 7: Safeguarding Compliance Checklist for Governors:

Date of completion:

Person(s) undertaking the check:

Item	Evidence of compliance	Notes of Discussion with DSL	Next Steps	Name of Person Responsible
1. The school has policy in place				
2. The policy is reviewed annually. The policy is clearly dated, highlighting the timescale for review.				
3. The policy is provided to all staff (including volunteers and visitors) at induction. Staff, visitors and volunteers understand and follow this policy robustly.				
4. A visitor safeguarding leaflet is readily available				
5. The policy is publicly available via the school or by other means and parents are made aware of the school's statutory responsibilities in accordance with the policy.				
6. All staff have read Part One and Annex B of KCSIE 2024				
7. All safer recruitment checks are evidenced in the Single Central Record, and this checked regularly for accuracy.				
8. Designated Safeguarding Lead: A senior member of the school's leadership team has been designated to take lead				

responsibility for dealing with child protection issues, to provide advice and support to staff and work with other agencies and they have received appropriate training to equip them to fulfil the role.				
9. There is at least one alternative person identified to fulfil the role in the DSL's absence and there is always cover for this role.				
10. All other staff and governors have undertaken appropriate training about their role and responsibility and refresher training at regular intervals.				
11. The school keeps up to date records of all staff safeguarding training including levels of training and dates.				
12. The Governing Body regularly receives a report outlining how the school is fulfilling the statutory requirements for safeguarding; these reports and any identified actions are clearly referenced in the minutes of meetings.				
13. There is a safeguarding poster visible for all staff which clearly states who the DSLs are and includes who to contact if concerns regarding the Head Teacher				
14. The school has a child appropriate safeguarding poster which is easily accessible				
15. The school has appropriate filtering arrangements				

<p>16.The school has a physical monitoring process and uses Smoothwall to identify attempted breaches of accessing unsuitable material, including the identification of children at most risk.</p>				
<p>17.The school has an appropriate curriculum which teaches children about how to stay safe with reference to:</p> <ul style="list-style-type: none"> a. E-safety b. Protected characteristics c. School values d. British Values e. Making safe risk assessments for life in modern Britain (e.g. topical issues (immigration, FGM, child sexual exploitation), sex and relationship education, fire/water/road safety, drugs and medicines, PSHE etc.) 				

Appendix 8: Prevent Duty Risk Assessment Templates

<https://www.gov.uk/government/publications/prevent-duty-risk-assessment-templates#:~:text=They%20support%20you%20to%20assess,size%20and%20type%20of%20setting>