# Safeguarding and Child Protection Safeguarding 1

| Issued by: | Deputy Head Boarding and Pastoral Care |
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## Contents

## External Safeguarding Contacts

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| Kent Safeguarding Children Multi-Agency Partnership (general enquiries (office hours)) | Telephone: 03000 42 11 26<br>**Email:** kscmp@kent.gov.uk<br>**Address:** Room 2.71, Sessions House, Maidstone, ME14 1XQ |
| Kent Safeguarding Children Multi-Agency Partnership (emergency contact details) | **03000 41 91 91**<br>**If you think someone is in immediate danger, the best thing to do is call 999 for the emergency services.** |
| Designated Officers of the Local Authority | 03000 412284<br>07540 677200<br>Gemma Willson Area Safeguarding Adviser (Education)<br>gemma.willson@theeducationpeople.org<br> Joanne Barnett Area Safeguarding Assistant<br>joanne.barnett@theeducationpeople.org<br>Rachel Unsworth Admin Support (part-time) |
| Integrated Children's Services | Front door: 03000 411111<br>Out of Hours Number: 03000 419191 |
| LADO Team | 03000 410888<br>Now it is just one number for the whole LADO Team covering Kent Local Authority<br>kentpupilslado@kent.gov.uk |
| Support and Advice about Extremism | Police: 101 |
| Adult Safeguarding | Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk |
| NSPCC Whistleblowing Advice Line | Weston House<br>42 Curtain Road<br>London<br>EC2A 3NH<br>0800 028 0285<br>help@nspcc.org.uk |
| Disclosure and Barring Service | DBS customer services<br>PO Box 3961<br>Royal Wootton Bassett<br>SN4 4HF<br>03000 200 190<br>customerservices@dbs.gov.uk |
| Teaching Regulation Agency | Teacher Misconduct<br>Ground Floor South<br>Cheylesmore House<br>5 Quinton Road<br>Coventry CV1 2WT<br>0207 593 5393<br>misconduct.teacher@education.gov.uk |
| Independent Schools Inspectorate | 0207 6000100<br>concerns@isi.net |

## Benenden Safeguarding Team

**DSL mobile: 07780 923413**

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| Designated Safeguarding Lead | Anne Wakefield<br>Deputy Head Boarding and Pastoral Care<br>01580 236973 |
| Deputy Designated Safeguarding Lead | Steve Miller<br>First Deputy<br>01580 236718 |
| Deputy Designated Safeguarding Lead | Kate Dobson<br>Assistant Director of Boarding and Hm of Limes<br>01580 236743 |
| Deputy Designated Safeguarding Lead | Neal George<br>Assistant Head, Head of Co-curricular<br>01580 236916 |
| Designated Teacher for Looked After Pupils | Anne Wakefield<br>Deputy Head Boarding and Pastoral Care<br>01580 236793 |
| Anti-Radicalisation Officer | Ali Harber<br>Deputy Head Academic<br>01580 236902 |
| School Medical Officer | Dr Sara Butler-Gallie<br>01580 236618 |
| Senior School Nurse | Kath Willdridge<br>01580 236618 |
| Headmistress | Sam Price<br>01580 236616 |
| Chair of Council | Anna Birkett<br>cmabirkett@benenden.School |
| Council Member with responsibility for Safeguarding | Fiona Cornish |

## Policy Statement

Benenden School ('the School') is committed to safeguarding and promoting the welfare of all pupils. All pupils have the right to be protected from all types of harm and abuse. This policy forms a fundamental part of our approach to providing excellent pastoral care to all pupils, including those who may be over the age of 18 years.

This policy is reviewed and updated annually (as a minimum) by the Governing Council and is available on the School website, staff portal or by emailing the School to request a copy of the policy.

## Introduction and Ethos

At Benenden, we recognise the importance of providing an ethos and environment within School that will help pupils to be safe and feel safe. In our School, pupils are respected and encouraged to talk openly.

Benenden is a boarding School, which means that pupils are away from home for extended periods of time and, as a result, are more vulnerable. Therefore, everyone who comes into contact with pupils has a role to play in keeping them safe and promoting their welfare. Their safety and wellbeing is at the centre of our work and staff must always act in the best interest of the pupils, listening to what they have to say and accessing help for them. Fears about sharing information should not get in the way of accessing help. We all share the responsibility for ensuring that we provide and maintain a safe environment in which pupils can live, learn and thrive. Safeguarding is everyone's responsibility.

Our School core safeguarding principles are:
> ➢ We are an important part of the wider safeguarding system for pupils.
> ➢ It is our whole School responsibility to safeguard and promote the welfare of pupils.
> ➢ All pupils (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
> ➢ All pupils have a right to be heard and to have their wishes and feelings taken into account.
> ➢ All our staff understand safe professional practice and adhere to our safeguarding policies.

## Context

This policy takes account of the following guidance and advice:

- The Education Acts
- Education (Independent Schools Standards) Regulations 2014 (as amended from time to time)
- Independent School Standards Guidance for independent Schools April 2019
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- The Pupil Act 2004
- What to do if you're worried a Child is being Abused 2015
- Working Together to Safeguard Children 2018 (A guide to inter-agency working to safeguard and promote the welfare of pupil)
- Keeping Children Safe in Education 2020 (including Annex A)
- Disqualification under the Childcare Act 2006 September 2018

- Information Sharing: Advice for practitioners providing safeguarding services 2018
- DBS Referrals Guidance (as may be amended from time to time)
- ISI Commentary on the Regulatory Requirements 2020
- National Minimum Standards for Boarding Schools 2015
- Teacher misconduct: regulating the teaching profession 2014 (and related guidance)
- Use of Reasonable Force in Schools 2013
- Preventing and Tackling Bullying 2014
- Prevent Duty Guidance, Channel Guidance, and Prevent Departmental Advice, 2015
- The use of social media for online radicalisation 2015
- Teaching Online Safety in School 2019
- Sexting in Schools and colleges: responding to incidents and safeguarding young people UKCCIS
- Sexual violence and sexual harassment between students in Schools and colleges 2018
- Relationships Education, Relationships and Sex Education (RSE) + Health Education

## Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined as:

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

*Keeping children safe in education* (2020)

- There are four main elements to our child protection policy

  o **Prevention** (e.g. positive, supportive, safe School culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
  o **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
  o **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
  o **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

- The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and governors and are consistent with those of Kent Safeguarding Children Multi-Agency Partnerships (KSCMP).
- The School acknowledges that this policy recognises a range of specific safeguarding issues including (but not limited to):

  o Bullying (including cyberbullying)
  o Children with family members in prison
  o Children Missing Education (CME)
  o Child missing from home or care
  o Child Sexual Exploitation (CSE)
  o Child Criminal Exploitation (County Lines)
  o Domestic abuse
  o Drugs and alcohol misuse
  o Fabricated or induced illness
  o Faith abuse
  o Female Genital Mutilation (FGM)

- o  Forced marriage
- o  Gangs and youth violence
- o  Gender based abuse and violence against women and girls
- o  Hate
- o  Homelessness
- o  Honour based abuse
- o  Human trafficking and modern slavery
- o  Mental health
- o  Missing children and adults
- o  Online safety
- o  Peer on peer abuse
- o  Preventing radicalisation and extremism
- o  Private fostering
- o  Relationship abuse
- o  Sexual Violence and Sexual Harassment
- o  Upskirting
- o  Youth produced sexual imagery or "Sexting"

(Also see Annex A within 'Keeping children safe in education' 2020)

## Policy Compliance, Monitoring and Review

At Benenden, we will review this policy at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures.

All staff (including temporary staff and volunteers) will be provided with a copy of this policy and part one of KCSIE (including Annex A). This will be sent to them electronically before they begin their role. In addition, they can also access a copy from the staff portal or via their line manager.

Parents/carers can obtain a copy of the Benenden Safeguarding and Child Protection policy and other related policies on request. The Safeguarding and Child Protection Policy is available on the website. www.benenden.School.

The policy forms part of our development plan and will be reviewed annually by the Safeguarding Committee and Governing Council which has responsibility for oversight of safeguarding and child protection systems.

The Designated Safeguarding Lead and Headmistress will ensure regular reporting on safeguarding activity and systems to the Safeguarding Committee and Governing Council. The Safeguarding Committee and Governing Council will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

## Key Responsibilities

The Governing Council have read and will follow KCSIE 2020.

The School has a nominated governor for safeguarding. Fiona Cornish is the nominated governor. The nominated governor will take the lead role in ensuring that the School has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

The Governing Council, Headmistress and Senior Management Team will ensure that the Designated Safeguarding Lead is properly supported in their role.

Designated Safeguarding Lead (DSL)

The School has appointed a member of the leadership team (Anne Wakefield, Deputy Head Boarding and Pastoral Care) as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection systems in School.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and any deputy DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

Deputy DSLs are trained to the same standard as the DSL. The Deputy DSLs at Benenden are: Steve Miller (First Deputy), Neal George (Assistant Head, Co-curricular) and Kate Dobson (Assistant Director of Boarding and Hm of Limes).

Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

**It is the role of the DSL to:**
- Act as the central contact point for all staff to discuss any safeguarding concerns.
- Maintain a confidential recording system for safeguarding and child protection concerns.
- Coordinate safeguarding action for individual children.
- When supporting children with a social worker or Children Looked After the DSL should have the details of the child's social worker and the name of the virtual School head in the authority that looks after the child (with the DSL liaising closely with the designated teacher).
- Liaise with other agencies and professionals in line with WTSC 2018 and KCSIE 2020.
- Ensure that locally established referral procedures are followed, as necessary.
- Represent, or ensure the School is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences).
- Manage and monitor the School's role in any multi-agency plan for a child.
- Be available during term time for staff in the School to discuss any safeguarding concerns.
- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and SMT.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2020).

Members of Staff

**All members of staff have a responsibility to:**
- Provide a safe environment in which children can learn.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Be prepared to identify children who may benefit from early help.
- Understand the early help process and their role in it.
- Understand Benenden's safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

Children and Young People

**Children and young people (pupils) have a right to:**
- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Contribute to the development of School safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

Parents and Carers

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

Parents can obtain a copy of the Benenden Safeguarding and Child Protection Policy and other related policies on request and can view them via the School website www.benenden.school

## What is Child Abuse?

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children. Abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

## Recognition and Types of Abuse and Neglect

- All staff in School should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect

Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

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

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

**Who are the abusers?**
Abusers might be parents or carers, siblings or members of the extended family, neighbours, teachers, strangers; in short, an abuser could be anyone.

**Signs of abuse**
All School staff members should be aware of the signs of abuse, neglect, and radicalisation so that they are able to identify cases of children who may be in need of help or protection.

The following may help staff to be aware of possible signs of abuse - There are further sources of information such as *What to do if you're worried a child is being abused* and the NSPCC website. However, such lists are not exhaustive - if staff members are unsure, they should always seek advice and report concerns even where signs/indicators are not present. Staff should also be alert to behaviours or circumstances that put children in danger, such as drug taking, alcohol abuse, self-harm, truanting, cyber bullying, and sexting (Youth Produced Sexual Imagery). There may be other signs of abuse specific to female genital mutilation, and to radicalisation of young people.

**Physical Abuse**
- Unexplained injuries/burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

**Emotional Abuse**
- Excessive overreaction to mistakes
- Continual self-deprecation
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol, and substance misuse
- Significant peer relationship difficulties

**Sexual Abuse**
- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or School performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

**Neglect**
- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

**Missing Children**

A child going missing from an education setting is a potential indicator of abuse and neglect. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly. Procedures are detailed in the Children Missing Education Policy. All concerns should be raised immediately with the DSL or Deputy.

**Child Sexual Exploitation**

Child sexual exploitation (CSE), child criminal exploitation (CCE) and forms of so-called 'honour based' violence including female genital mutilation (FGM) and breast ironing are child abuse. Domestic abuse and attempts to draw children into violent extremism or serious violent crime should also be treated as a safeguarding issue. If a teacher discovers that an act of FGM appears to have been carried out on a pupil under the age of 18 the teacher must report this to the police.

**Sexting**

Is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Pupils are taught about sexting as part of their internet safety education. The School takes incidences of sexting extremely seriously, and deals with them in accordance with child protection procedures, including reporting to the police.

## Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside the School. Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. All staff should consider the context within which such incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

**Looked After Children and Previously Looked After Children**

The School will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after, by the local authority.

**Private Fostering**

Private fostering occurs where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home. If a member of staff becomes aware that a pupil may be in a private fostering arrangement, they should raise this in the first instance with the Designated Safeguarding Lead. The School will then notify the local authority of the circumstances.

## Creating a Culture of Safeguarding

The School recognises that safeguarding covers much more than child protection, and so this Policy will operate in conjunction with and other related policies and procedures. These cover areas including equal opportunities; Health and Safety; First Aid; Educational Visits; Anti-bullying; Peer on Peer abuse; Pupil Behaviour; Drugs, Alcohol and Tobacco, Mental Health; Online Safety (including mobile technology and social media); Fundamental British Values, and Preventing radicalisation and violent extremism. Such policies are available from the School on request.

The School takes seriously its responsibility to promote and nurture the mental health and wellbeing of all its pupils and staff. This is reflected in its policies and procedures for pastoral care and the School's PPD, PSP and Form Order programmes.

'Safeguarding' is broader than 'child protection'. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the welfare of children.  It is recognised that safeguarding and promoting the welfare of children includes:

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

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The School recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly, and challenging inaction.

At Benenden, we believe that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our pupils should make sure that their approach is child-centred (that is, that they consider, at all times, what is in the best interests of the child).

As well as ensuring that the School's policies and procedures support its safeguarding responsibilities, the School will work with pupils and their families, and contribute to inter-agency working, in line with the statutory guidance *Working Together to Safeguard Children*. This includes providing a co-ordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

We are committed to working in partnership with parents, Social Services Departments, and diverse communities, to continuously develop and improve the safeguarding culture within our School.

Having these safeguards in place not only protects and promotes the welfare of children but also it enhances the confidence of our staff, volunteers, parents/carers, and the general public.

The School has systems to:

- Prevent, as far as is reasonably possible, unsuitable people working with pupils through rigorous recruitment procedures;

- Identify pupils who are at risk of and/or are likely to suffer significant harm and take appropriate action, and promote the welfare of pupils in need of additional support;

- Promote safe practice and challenge poor and unsafe practice;

- Protect, where reasonably possible, pupils and staff from online risks, which include online safety education and training, policies and procedures governing the use of IT, filtering and monitoring systems, and procedures to manage any incidents that occur;

- Filter and monitor online activity via applications which prevent access to blocked internet sites, and report on attempts to access sites that may give rise to concern. Email messages between staff and pupils are also scanned for inappropriate language and behaviour. We currently use the software Smooth Wall for this;

- Deal with issues of confidentiality, information sharing and consent;

- Ensure that staff do not, through their actions, place pupils at risk of harm, or place themselves at risk from an allegation of harm (by providing guidance on areas such as 1:1 tuition, sports coaching, conveying by car, inappropriate electronic communication). Relevant guidance can be found in the staff code of conduct.

The School encourages the pupils in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages pupils to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.

All staff are required to adhere to the *ICT Acceptable Use Agreement*, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.

**Boarding**

As a School with all boarding pupils, Benenden recognises the special measures that need to be in place to promote the welfare of children living away from home.  Staff are aware of the particular need to be alert to pupil relationships and the potential for peer abuse.

All adults visiting boarding accommodation (e.g. visitors and maintenance personnel) are under sufficient staff supervision to prevent substantial unsupervised access to boarders or their accommodation.

There is a written agreement between the School and any person over 16 not employed by the School but living in the same premises as boarders (for example, members of staff households). This specifies the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have contact with children. They are also required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence.

Resident members of staff households are also made aware of the School's Safeguarding procedures, and sign a declaration that they have read and will act in accordance with the School's Safeguarding Policy.

If an allegation is made against a member of the boarding staff, the Head may require the member of staff to be relocated to a residence off site, pending a full investigation.

There is a policy, known to staff and used in practice, for searching for and, if necessary reporting, any boarder missing from School. This can be found in the Staff Handbook.

The School makes known to boarding pupils, through information posters and briefings, their right to complain about the boarding provision to the Children's Commissioner:
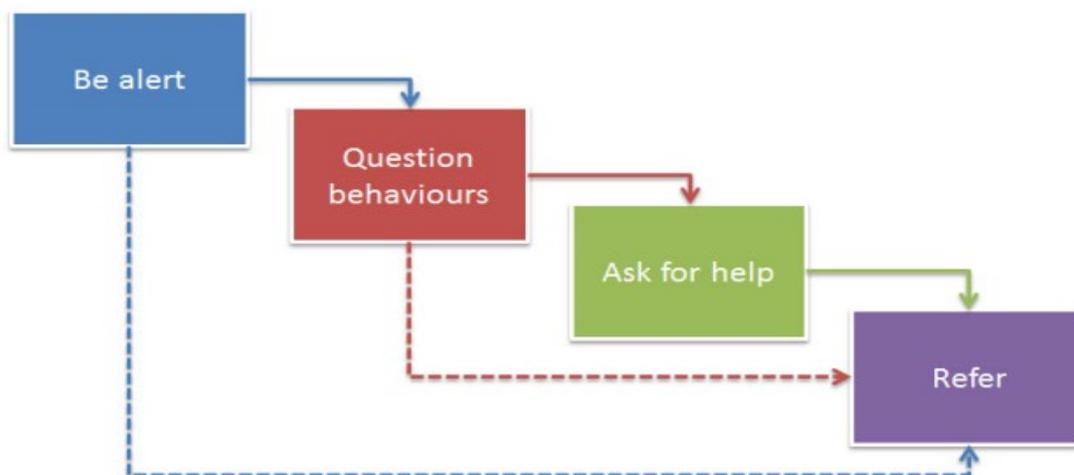
www.childrenscommissioner.gov.uk

tel: 0800 528 0731

## Safeguarding and Child Protection Procedures

Benenden adheres to the KSCMP Safeguarding Children Procedures.
https://www.kscmp.org.uk/procedures
https://www.kelsi.org.uk/

All members of staff are expected to be aware of and follow this approach ('*What to do if you are worried a child is being abused' 2015*'):



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Children's Social Work Services and/or the police.

**The role of the School in situations where there are child protection concerns is NOT to investigate but to recognise and refer.**

The School adheres to the Kent Safeguarding Children multi-agency partnership procedures (KSCMP). The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on their website: https://www.kscmp.org.uk/

The DSL may seek advice or guidance from the Area Education Safeguarding Adviser from the Education Safeguarding Service at Kent CC before making a decision regarding next steps. They may also seek advice or guidance from a social worker at the Front Door service. See contact details at the beginning of this policy.

The School recognises that in situations where there are immediate child protection concerns identified in line with Support Level Guidance, it is NOT to investigate as a single agency but to act in line with KSCMP guidance which may involve multi-agency decision making**.**

If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Integrated Children's Services (Front Door) and/or the police in line with KSCMP procedures.

All members of staff are made aware of the internal and local early help support services. Where a child is being offered or receiving early help support, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the Front Door if the situation does not appear to be improving or is getting worse.

All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

**In all but the most exceptional circumstances, parents /carers will be made aware of the concerns for their child at the earliest possible stage.** In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought in line with guidance provided by KSCMP, unless there is a valid reason not to do so, for example if to do so would put a child at risk of harm and would undermine a criminal investigation.

In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from one of the Deputy DSLs. They may also seek advice from the Education Safeguarding Service or via consultation with a social worker from the Front Door. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible that a referral has been made.

On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe, and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the School's escalation process. Staff should refer to the School's whistling blowing policy or NSPCC guidelines and helpline 0800 028 0285.

If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider re-referral.  Professional disagreements (escalation) will be responded to in line with the KSCMP procedures and DSLs may request support via the Education Safeguarding Service.

If staff have concerns about a child (as opposed to a child being in immediate danger or at risk of harm) they will need to decide what action to take. All staff should be prepared to identify children who may benefit from **early help**, that is, support as soon as a problem emerges. Such problems should be discussed in the first instance with the Designated Safeguarding Lead. The early help process may also involve sharing information with other professionals and contributing to an early help assessment.

## What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about a pupil who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or pupil's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or Kent Children's Services.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, Safeguarding Team, Anti-radicalisation officer and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect pupils from being drawn into terrorism and are regularly revised.

## Arrangements for Visiting Speakers (including online)

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a visiting speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School will also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

## Early Help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

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

- Is disabled and has specific additional needs
- Has special educational needs
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol
- Is at risk of modern slavery, trafficking, or exploitation
- Is in a family circumstance presenting challenges for the child such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Has returned home to their family from care
- Is at risk of being radicalised or exploited
- Is a privately fostered child

## Record Keeping

Staff will record any welfare concern that they have about a child on the School's pastoral care and safeguarding system CPOMS. They will pass them, without delay, to the DSL. Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSL as this needs to take priority.

All safeguarding concerns, discussions, and decisions (and justifications for those decisions) will be recorded in writing via the pastoral system CPOMS. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL or a Deputy DSL.

All concerns must be logged on CPOMS.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the School. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL in her office. Safeguarding records are shared with staff on a 'need to know' basis only. The files are locked in the separate filing cabinet in the DSL office and can only be accessed by the Safeguarding Team.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent School/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

Detailed guidance on Record Keeping is found in a separate document "Guidelines for Safeguarding Record Keeping in Schools".

The Headmistress will be kept informed of any significant issues by the DSL.

## Multi-agency Working

Benenden School recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTTSC 2018)

Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. Benenden School recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

The School Management Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

## Confidentiality and Information Sharing

Benenden School recognises that all matters relating to child protection are confidential. The Headmistress or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2020).

Benenden has an appropriately trained Data Protection Officer as required by the General Data Protection Regulations (GDPR) to ensure that we are compliant with all matters relating to confidentiality and information sharing requirements.  Julie Lerbech is the DPO.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. **Never promise confidentiality**.

DfE Guidance on Information Sharing (July 2018) provides further detail.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

## Complaints

The School has a **Complaints Procedure** available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found on the staff portal or on the website. The Pupil Complaints Procedure is in the Pupil Handbook.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff later in this policy and following KCSIE (2020).

## Staff Induction, Awareness and Training

All members of staff have been provided with a copy of Part One of "*Keeping Children Safe in Education*" (2020) including Annex A which covers Safeguarding information for all staff. School leaders and all members of staff who work directly with children will access Annex A within Keeping Children Safe in Education 2020. Members of staff have signed to confirm that they have read and understood Part One and Annex A. This is processed by the Deputy Head Boarding and Pastoral Care's office and recorded appropriately. Periodically there are quizzes for staff to complete to ensure they have understood the documents. The SMT and Safeguarding Team will read the entire document.

The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the School's internal safeguarding processes.

All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues.

All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually. Updates are generally given to all staff every term by the DSL or member of the Safeguarding Team.

All staff members (including temporary staff) will be made aware of the School's expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Policy.

Through the induction process and at other times as deemed necessary, staff will also be asked to read the Pupil Behaviour policy, Staff Code of Conduct, safeguarding response to children who go missing from education, the Anti Bullying policy as well as the Safeguarding and Child Protection policy.

The DSL and Headmistress will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.

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

Staff are encouraged to contribute to and shape our safeguarding arrangements and child protection policies by speaking with a member of the Safeguarding Team.

## Safe Working Practice

All members of staff are required to work within clear guidelines in the School's Staff Code of Conduct. As part of the induction process, staff sign to confirm they have read the Code of Conduct.

Staff should be aware of the School's Physical Contact and Reasonable Force Policy, and any physical interventions must be in line with this policy and procedures.

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the School's Online Safety and Acceptable Use policies. Please also refer to the staff Code of Conduct.

### Staff Supervision and Support

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

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

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

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

The DSL will also put staff in touch with outside agencies for professional support if they so wish such as the GSA and BSA.

## Safer Recruitment

At Benenden we are committed to ensuring we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff. We will follow relevant guidance in Keeping Children Safe in Education 2020 (Section 3 'Safer Recruitment') and from The Disclosure and Barring Service (DBS).

The Governing Body and Senior Management Team are responsible for ensuring that the School follows safe recruitment processes outlined within guidance.

Benenden School is responsible for ensuring that the School maintains an accurate Single Central Record (SCR) in line with statutory guidance.

The Governing Council will ensure that at least one of the persons who conducts an interview, has completed safer recruitment training.

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

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

We will ensure that all staff and volunteers have read the Staff Behaviour Policy/Code of Conduct and understand that their behaviour and practice must be in line with it.

## Allegations Against Members of Staff and Volunteers

At Benenden, we recognise that it is possible for any member of staff, including volunteers, governors, contractors, agency, and third-party staff (including supply teachers) and visitors to behave in a way that:

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

Such allegations should be referred immediately to the Headmistress, or deputy in her absence, who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headmistress then staff are advised that allegations should be reported to the Chair of Council (Anna Birkett) who will contact the LADO in the first instance.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Senior Management Team.

All members of staff are made aware of the School's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00am to 8:00pm Monday to Friday) or email: help@nspcc.org.uk

Benenden School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our School, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools' Personnel Service.

**When in doubt – consult**

## Safeguarding Children with Special Educational Needs and Disabilities

At Benenden, we acknowledge that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.

We will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionally impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

## Peer on Peer Abuse

**Please also refer to separate policy (Peer on Peer Abuse Policy)**

All members of staff at Benenden recognise that children are capable of abusing their peers. Peer on Peer abuse can take many forms, including but not limited to, bullying, cyberbullying, gender-based abuse, hazing (initiation type violence), sexually harmful behaviour, violence, and 'sexting'. Staff are to be mindful that some potential issues may be affected by gender, age, sexuality, ability, and culture of those involved.

At Benenden, we believe that abuse is abuse and it will never be tolerated. It will not be passed off as 'banter' or 'just having a laugh'. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.

'Upskirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

'Sexting' (Youth Produced Sexual Images) will not be tolerated. The School will respond to cases of 'sexting' in line with UKCCIS "Sexting in Schools and Colleges" guidance and in line with Kent Safeguarding Children Multi-Agency Partnership (KSCMP) guidance.

When responding to concerns relating to child on child sexual violence or harassment, Benenden will follow guidance outlined in part five of KCSIE 2020 and 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges'.

## Gangs, County Lines, Serious violence, Crime and Exploitation

We recognise the impact of gangs, county lines, violent crime, and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.

- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:
  - Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
  - Increased absence from School.
  - Change in friendships/relationships with others/groups.
  - Significant decline in performance.

- o Signs of self-harm/significant change in wellbeing.
- o Signs of assault/unexplained injuries.
- o Children who associate with other young people involved in exploitation.
- o Children who suffer from changes in emotional wellbeing.
- o Children who go missing for periods of time or regularly come home late.
- o Children who regularly miss School or education or do not take part in education.

## Mental Health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

## Online Safety
**Please also refer to the Online Safety Policy.**

It is recognised by all staff that the use of technology presents challenges and risks to children and adults both inside and outside of School.

The DSL has overall responsibility for online safeguarding within the School but the Online Safety Officer (First Deputy) oversees all online safety matters. They are a member of the Safeguarding Team.
We identify that the issues can be broadly categorised into three areas of risk:
- o **content:** being exposed to illegal, inappropriate, or harmful material.
- o **contact:** being subjected to harmful online interaction with other users.
- o **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

The DSL and Safeguarding Team have read Annex C regarding Online Safety within 'Keeping Children Safe in Education' 2020 and also Teaching Online Safety in School June 2019. At Benenden we recognise the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2020, have appropriate policies in place that are shared and understood by all members of the School community. Further information reading the specific approaches relating to this can be found in the School's **Online Safety Policy**, **Acceptable Use Policy** and **Staff Code of Conduct.** These policies can all be found on the staff portal*.*

We ensure that appropriate filtering and monitoring systems are in place when pupils and staff access School systems and internet provision. Our current provision is Smooth Wall.

We acknowledge that whilst filtering and monitoring is an important part of the School's online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the School control such as mobile phones. Other appropriate filtering and monitoring systems are in place when pupils and staff access School systems and internet provision enabled devices and technology. Where concerns are identified, appropriate action will be taken.

We will ensure a comprehensive whole School curriculum response through PPD, Form Order and the Houses is in place to enable all pupils to learn about and manage online risks effectively and will support parents and the wider School community (including all members of staff) to become aware and alert to the need to keep children safe online.

**Curriculum and Staying Safe**

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

Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness, and decision making so that pupils have a range of contacts and strategies to ensure their own protection and that of others. Online safety is integrated into the curriculum.

Our School systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

## The Use of School Premises by Other Organisations

Where services or activities are provided separately by another body using the School premises, the Headmistress  and Governing Council will seek written assurance that the organisation(s) concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

If this assurance is not achieved, then an application to use premises will be refused. Risk assessments will be carried out, as necessary.

## Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into School as outlined within the relevant guidance. Visitors will be expected to sign in and out via the School Office or Facilities Office visitor log and to display a visitor badge whilst on School site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

Visitors to site will be given an information booklet that details what to do if they have a Safeguarding concern about a Benenden pupil. Visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.

All visitors will be accompanied whilst on our School site.

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

## Monitoring and Review

All School staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers.

The policy forms part of our School development plan and will be reviewed annually.

## Related safeguarding policies

Pupil Behaviour

Anti-Bullying

Pastoral Care and Pupil Wellbeing

Staff Code of Conduct

Online Safety

Physical Contact and Use of Reasonable Force

Anti-Radicalisation

Peer on Peer Abuse

Children Missing from Education

Safer Recruitment

Whistleblowing

Acceptable use of Technology

Acceptable use of Mobile Phones and Handheld Devices

Relationships and Sex Education

Data Protection

**Appendix 1: What to do if you have a welfare concern about a Pupil**

Why are you concerned?

For example:

Something a child has said – e.g. allegation of harm

Child's appearance – may include unexplained marks as well as dress

Behaviour change

**Inform the Designated Safeguarding Lead or member of the Safeguarding Team**

**Designated Safeguarding Lead**

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home.
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk.
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services.
- If unsure then consult with Area Education Safeguarding Adviser or Local Authority Social Worker at the Front Door.

**If you are unhappy with the response**

**Staff:**

- Follow local escalation procedures.
- Follow Whistleblowing procedures.

**Learners and Parents:**

- Follow School complaints procedures.

**Record decision making and action taken in the pupil's child protection/safeguarding file/ CPOMS**

**Monitor**

Be clear about:

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

**Review** and **request further support** (if necessary)

At all stages, the child's circumstances will be kept under review

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

## Appendix 2: Signs and Types of Abuse

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

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

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

**Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving pupil in looking at, or in the production of, sexual images, watching sexual activities, encouraging pupil 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 another pupil. Sexual abuse also includes sexual violence and sexual harassment which can occur between two pupils of any sex. They can also occur through a group of pupils sexually assaulting or sexually harassing a single child or group of pupils. Sexual violence is a sexual offence under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;  sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

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

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

**Serious violence:** indicators which may signal that pupils are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put pupils in danger. Safeguarding issues can also manifest themselves via peer on peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, pupil missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage;  gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child sexual exploitation:** is a form of sexual abuse where pupils are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of pupils who are victims of sexual exploitation go missing from home, care, and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Pupil who appears with unexplained gifts or new possessions;
- Pupil who associates with other young people involved in exploitation;
- Pupils who have older boyfriends or girlfriends;
- Pupil who suffers from sexually transmitted infections or become pregnant;
- Pupil who suffers from changes in emotional wellbeing;
- Pupil who misuses drugs and alcohol;
- Pupil who goes missing for periods of time or regularly come home late; and
- Pupil who regularly misses School or education or do not take part in education.

**Child criminal exploitation (county lines):** Criminal exploitation of pupils is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit pupils and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**So called 'honour based' violence:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including  Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.  To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

**If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Student Social Care.  If in any doubt, staff should speak to the DSL.**

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.  Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve pupil's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence)  or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

**Forced marriage:**  Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding pupils from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

**Radicalisation:**  Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The Internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in pupil's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Lesbian, gay, bi or trans (LGBT):** Pupils who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as pupils who identify as LGBT.

**Domestic abuse:** Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have

been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial, and emotional.

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on a pupil. The School should be mindful that pupils can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Pupils who go missing from School:** A child going missing from School is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with pupils who go missing, particularly on repeat occasions. The School's procedure for dealing with pupils who go missing can be found in the Missing Pupil Policy on the staff portal.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify pupils of compulsory School age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend School regularly, or has been absent without the School's permission for a continuous period of 10 School days or more.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

**Pupil and the court system:** Pupil are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support pupils 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for pupils. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

**Pupils with family members in prison:** Approximately 200,000 pupils in England and Wales have a parent sent to prison each year. These pupils are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The **National Information Centre on Children of Offenders** provides information designed to support professionals working with offenders and their pupil, to help mitigate negative consequences for those pupils.

## Appendix 3: Procedures for dealing with Allegations against Staff

The case manager will follow the advice set out in *Keeping children safe in education* (Sept 2020), *Working Together to Safeguard Children* (July 2018) and *Kent and Medway Safeguarding Children Procedures.*

In outline, the guidance advises that the Headmistress/Case Manager must:

1. Take any necessary immediate action to protect individual pupils. (The School recognises that no investigation of the allegations can be undertaken before consultations with the LADO and the police have taken place, so as not to jeopardise a police investigation.)
2. Consult with the LADO:
   - This will focus on the nature, content and context of the allegation and whether or not the police should be informed.
   - The initial sharing of information and evaluation may lead to a decision that action or no further action is to be taken with regard to the individual who is subject to the allegation.
   - There may need to be a strategy discussion – see *Working Together to Safeguard Children (July 2018)* for guidance - or police or children's social care services might need to be involved and a decision may need to be taken about whether or not to suspend the person, all of which should take place before the individual is informed. Due weight will be given to the views of the LADO, KCSIE and WT when making a decision about suspension.
   - Communication with the individual and the parents must be agreed.
   - The case manager will take advice from the LADO, police, and children's social services to agree:
     - Who needs to know and exactly what information can be shared.
     - How to manage speculation, leaks and gossip.
     - What, if any information can reasonably be given to the wider community to reduce speculation.
     - How to manage press interest if it arises.
     - The consultation will be recorded in writing.
3. Inform the accused person about the allegation as soon as possible after consulting the LADO and any other agencies the LADO considers should be involved.
4. Tell the parents/carers of the child about the allegation as soon as possible and make the parents aware of the requirement to maintain confidentiality about any allegations against teachers whilst the investigation is ongoing. Consider what support will be needed for the child and parents about whom the allegation has been made.
5. Consider what support is needed or any action which should be taken in respect of the person making the allegation.
6. Keep the Chair of Council informed of all allegations and ongoing investigations and their outcomes.

**Exit Arrangements and Referrals**

If the accused person resigns or ceases to provide their services, allegations will be followed up. The School will refer promptly to the Disclosure and Barring Service any person whether employed, contracted, a volunteer or a pupil who has harmed or poses a risk of harm to a child or vulnerable adult;

- Where the harm test is satisfied in respect of that individual.
- Where the individual has received a caution or conviction for a relevant offence; or if there is a reason to believe that an individual has committed a listed relevant offence.
- Where that individual has been removed from working (paid or unpaid) in regulated activity, or would have been had they not left.

In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a pupil teacher or other trainee; no longer using staff employed

by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.

The School recognises the duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) if the conduct does not reach the DBS threshold and where a prohibition order might be necessary instead. In this case the guidance _Teacher misconduct: the prohibition of teachers_ (October 2015) and information on the TRA website will be used. The reasons that such an order would be considered are:

- Unacceptable professional conduct
- Conduct that may bring the profession into disrepute
- Conviction at any time for a relevant offence.

The School recognises making a compromise/settlement agreement could constitute a criminal offence by the School and that compromised agreements cannot be used to prevent a referral being made.

## Outcomes of Investigations

Allegations found to be malicious will be removed from personnel records. For all other allegations, the following will be kept on the confidential file of the accused and a copy provided to the accused:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- A note of any action taken, and decisions reached, will be kept on the confidential personnel file of the accused.

The purpose of the record is to enable accurate information to be given in response to any future reference request, where appropriate. The record will be retained until the accused has reached normal pension age or for a period of ten years from the date of the allegation if that is longer.

Cases in which an allegation is proven to be false, unsubstantiated, or malicious will not be included in employer references.

## Appendix 4: Additional support

**Support for Staff**

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

**Support for Pupils**

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

**Support for Adults**

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

**Support for Learning Disabilities**

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

**Domestic Abuse**

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- Domestic abuse services: www.domesticabuseservices.org.uk

**Honour based Violence**

- Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage

**Sexual Abuse and CSE**

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

**Online Safety**

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

**Radicalisation and Hate**

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

## Appendix 5: Safeguarding Team 2020

Designated Safeguarding Lead

Mrs Anne Wakefield

Headmistress

Mrs Samantha Price

Deputy DSL/Anti-Bullying

Miss Kate Dobson

Deputy DSL/Online Safety

Mr Steve Miller

Anti-Radicalisation

Mrs Ali Harber

Deputy DSL

Mr Neal George

School Medical Officer

Dr Sara Butler-Gallie