

# NAS Schools Safeguarding Children and Young People (Child Protection) Policy – SO-0189

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## Equality Statement

We will regularly review our policies to seek to ensure that we are

- promoting equality of opportunity
- eliminating discrimination and harassment
- valuing diversity and promoting positive relationships
- providing an inclusive education which enables all pupils to develop their full potential
- meeting the requirements of the Equality Act 2010 and the protected characteristics therein.

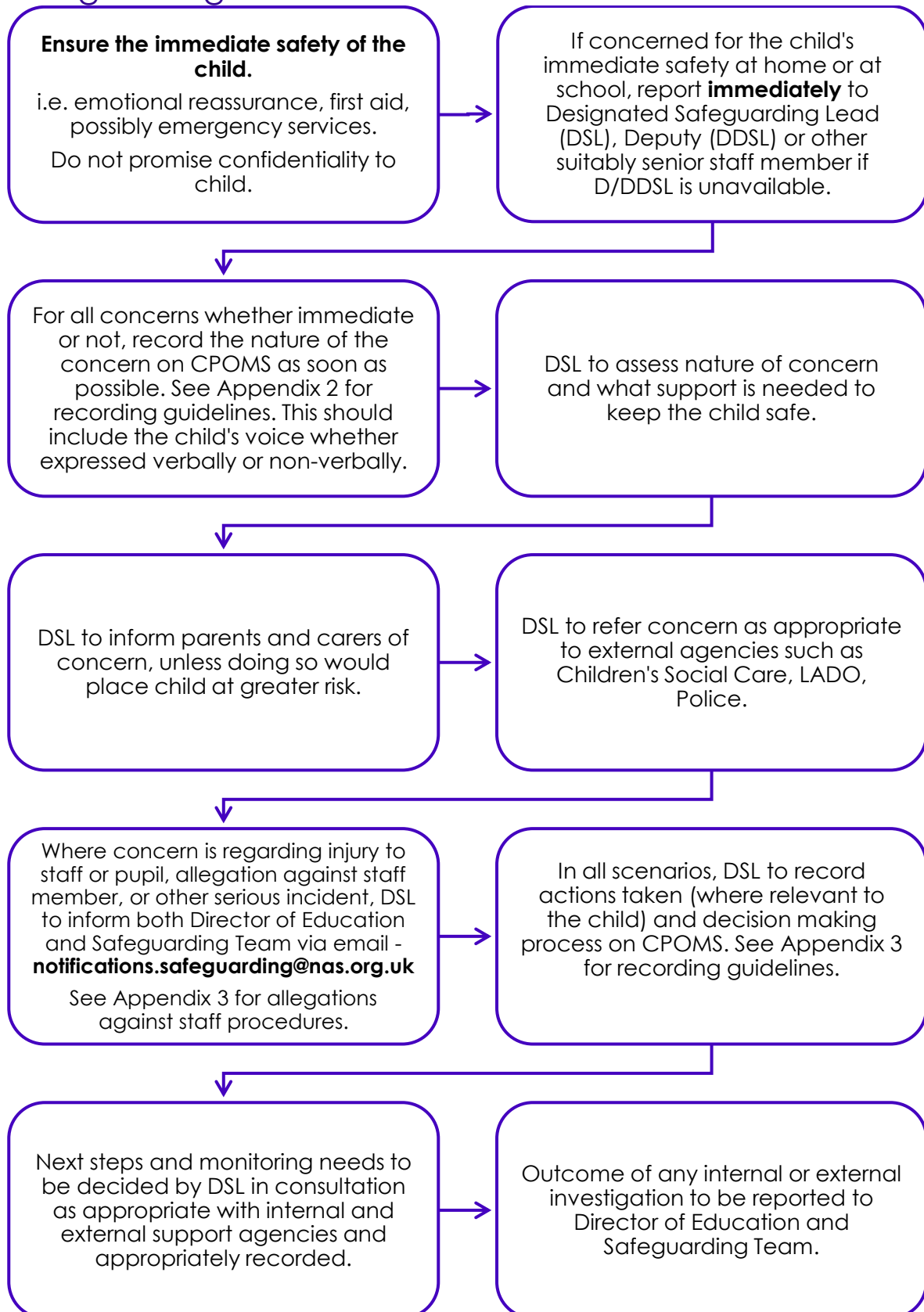
## Quality of Life Framework

All NAS Schools and Children's Services follow our Quality of Life (QoL) Framework. In implementing this framework, we listen to pupils, parents and the child's keyworker to understand what is important to them in relation to their quality of life. We then work as a transdisciplinary team to seek to ensure we plan each child's education carefully and cohesively, shaping each pupil's provision around their EHCP and

agreed developmental goals in order to develop pupils' knowledge and skills now and for the future.

**“Our goal is to help transform lives, change attitudes and create a society that works for autistic people.” The National Autistic Society**

## Safeguarding Flowchart



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## 1. Safeguarding Policy Principles

- 1.1. This policy has been authorised by the Trustees of The National Autistic Society, is published on the school website and is available in hard copy to parents on request. This policy can be made available in large print or other accessible format if required.
- 1.2. This policy and its procedures apply wherever staff or volunteers are working with pupils even where this is away from the school, for example on an educational visit. It also applies in our school's Post-16 provision.
- 1.3. *Keeping Children Safe in Education 2023* defines safeguarding and promoting the welfare of children as:
  - 1.3.1. protecting children from maltreatment;
  - 1.3.2. preventing impairment of children's mental and physical health or development;
  - 1.3.3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - 1.3.4. taking action to enable all children to have the best outcomes.
- 1.4. Every pupil should feel safe and protected from any form of abuse. The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. As is stated in Part One: Paragraph 2 of *Keeping Children Safe in Education (2023)*: "Safeguarding and promoting the welfare of children is **everyone's responsibility**. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is **child-centred**. This means that they should consider, at all times, what is in the **best interest of the child**".
- 1.5. Everyone at the school will maintain an attitude of '**it could happen here**' where safeguarding is concerned.
- 1.6. We know that autistic children are potentially more vulnerable, because their communication may not be understood by others, they may struggle with social interaction or have difficulties understanding people's motives, they may be less able to report abuse and thus be more vulnerable to it. This necessitates greater vigilance among professionals in recognising, reporting and investigating potential signs of abuse as well as ensuring that safeguarding issues remain on the agenda when working with autistic children and young people;

### The School will take all reasonable measures to:

- 1.7. Adopt a child-centered approach, ensuring that there is a culture of vigilance where staff actively listen and observe all children and young people to identify concerns, seeking wishes and feelings of children through various mediums. The child's voice (whether verbal or non-verbal) will be actively sought when addressing any concerns or liaising with other agencies;
- 1.8. Ensure that we practice safer recruitment in checking the suitability of staff, and volunteers (including Trustees, School Governing Group and staff employed by another organisation) to work with children and young people

- and maintain an up to date Single Central Record in line with *Keeping Children Safe in Education (2023)*;
- 1.9. Ensure that where staff from another organisation are working with our pupils, on site or on another site, we require written confirmation that appropriate child protection checks and procedures have been completed on those staff (including Alternative Provision and Tutoring services);
  - 1.10. Follow the local inter-agency procedures of the Kent Safeguarding Partnership (three Safeguarding partners: the local authority, the Integrated Care System (ICS, previously CCG) and the Chief Officer of Police);
  - 1.11. Be alert to signs of abuse and neglect, both in the school, from outside (including within the community, at home and online) and to protect each pupil from any form of abuse, whether from an adult or another pupil (child on child abuse);
  - 1.12. Deal appropriately with every suspicion or disclosure of abuse and to support children who have been abused or considered to be at risk, in accordance with any agreed Child Protection plan, Child in Need plan or Early Help/Team Around the Child (or equivalent plan);
  - 1.13. Be aware that behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk of significant harm;
  - 1.14. Design and operate procedures which, so far as possible, ensure that teachers and others who have not done wrong are not prejudiced by false allegations;
  - 1.15. Be alert to the needs of Autistic individuals including any medical needs, physical and mental health conditions.
  - 1.16. Identify children who may be more vulnerable to radicalisation, and know what to do when they are identified;
  - 1.17. Identify children who may be more vulnerable to exploitation (criminal, including through county lines and sexual), and know what to do when they are identified;
  - 1.18. Operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
  - 1.19. In line with *Prevent Duty Guidance: England and Wales (2023)*, have due regard to the need to prevent people becoming terrorists or supporting terrorism. We should be alert to not only violent extremism but also non-violent extremism, including certain divisive or intolerant narratives which can reasonably be linked to terrorism. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.
  - 1.20. Teach pupils about safeguarding and online safety, as appropriate to their understanding and learning needs for example through use of online resources, through the curriculum and PSHE (including Relationship, Sex and Health Education), together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building

- resilience to protect themselves and their peers, and information about who they should turn to for help;
- 1.21. Take all practicable steps to ensure that school premises are as secure as circumstances permit;
  - 1.22. Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our school or in our local area.
  - 1.23. Ensure all staff understand that they are responsible for reporting all safeguarding and child protection concerns that they become aware of. Staff must report to the Designated Safeguarding Lead (or deputy) and document all concerns and action taken into CPOMS or otherwise as directed by the DSL. Staff will be provided with training on how and when to use the reporting system by the Designated Safeguarding Lead upon Induction and annually thereafter.
  - 1.24. Children and young people, and their parents and carers, should be informed of NAS child protection procedures, and what to expect, in their preferred communication and appropriate to their understanding.

## 2. Statutory and Regulatory Framework

This policy has regard to law, statutory guidance, regulations and standards issued by the UK Government in accordance with:

- 2.1. [Section 94 of the Education and Skills Act 2008](#)
- 2.2. [Home Office - Prevent Duty Guidance: England and Wales \(2023\)](#)
- 2.3. [Home Office - Channel Duty Guidance: Protecting People Susceptible to Radicalisation \(2023\)](#)
- 2.4. [Department for Education - Keeping Children Safe in Education 2023](#)
- 2.5. [Department for Education - Working Together to Safeguard Children \(2023\)](#)
- 2.6. [The Education \(Independent School Standards\) \(England\) Regulations 2014](#)
- 2.7. [Department for Education - Early Years Foundation Stage \(EYFS\) Statutory Framework](#)
- 2.8. [The Children Act 1989](#)
- 2.9. [Section 175 of the Education Act 2002](#)
- 2.10. [Female Genital Mutilation Act 2003](#)
- 2.11. [The Children Act 2004](#)
- 2.12. [The Children and Families Act 2014](#)
- 2.13. [The Children and Social Work Act 2017](#)
- 2.14. [Department for Education - The Designated Teacher for Looked-After and Previously Looked-After Children \(2018\)](#)
- 2.15. [Department for Education - Information Sharing Advice for Safeguarding Practitioners \(2023\)](#)
- 2.16. [Department for Education - What To Do If You're Worried A Child Is Being Abused: Advice For Practitioners \(2015\)](#)
- 2.17. [Department for Education - Child Sexual Exploitation: Definition and Guide for Practitioners \(2017\)](#)
- 2.18. [Department for Education - Children Missing Education Statutory Guidance \(2016\)](#)
- 2.19. [Home Office - Female Genital Mutilation: Resource Pack](#)

- 2.20. [Department for Education - Disqualification Under the Childcare Act 2006 \(2018\)](#)
- 2.21. [Home Office - Criminal Exploitation of Children and Vulnerable Adults: County Lines \(2023\)](#)
- 2.22. [Department for Education - Help, Protection, Education: Concluding the Children in Need Review \(2019\)](#)
- 2.23. [Department for Education - Teaching Online Safety in Schools \(2023\)](#)
- 2.24. [Department for Education - Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2021\)](#)
- 2.25. [Department for Education - Working Together to Improve School Attendance \(2022\)](#)
- 2.26. [Department for Education - Behaviour in Schools \(2022\)](#)
- 2.27. [Department for Education - Suspension and Permanent Exclusion Guidance \(2022\)](#)

### 3. Associated Policies

This Policy should be read alongside the school's:

- 3.1. Positive Behaviour Support Policy SO-0029
- 3.2. Supporting Behaviour in Schools Policy SO-030
- 3.3. Complaints Resolution Policy NAS Schools and Children's Services QS-0010
- 3.4. Admissions, Remissions and Exclusions Policy SO-0230
- 3.5. Incident Management Policy QS-001
- 3.6. Safeguarding Adults Policy and Procedure SO-0194
- 3.7. Online Safety Policy SO-0106
- 3.8. Anti-bullying in NAS Schools & Children and Young People's Services Policy - SO-0193
- 3.9. Mobile Phones (Personal) Policy SO-0001
- 3.10. Data Protection IGP-02
- 3.11. Acceptable Use of ICT Policy ISP-09
- 3.12. Whistleblowing SO-0023
- 3.13. Conduct & Capability Policy HR-0040
- 3.14. Safer Recruitment Policy and Guidance for NAS Schools & Services HR-0021
- 3.15. Staff Code of Conduct
- 3.16. Relationships and Sex Education Policy SO-0133
- 3.17. Intimate Care Policy for Schools and Children & Young People's Services SO-0005
- 3.18. Use of Restrictive Practice in Schools Policy SO-0039
- 3.19. Wellbeing and Mental Health in Schools Policy SO-0353
- 3.20. Supported Home Learning SO-0351
- 3.21. Safeguarding Quality Assurance Framework
- 3.22. Safeguarding Incident Investigation Tools



## 4. The Designated Safeguarding Lead

4.1. The school has appointed a senior member of staff with the necessary status and authority (Designated Safeguarding Lead) to be responsible for matters relating to safeguarding, child protection and welfare.

4.2. The **Designated Safeguarding Lead for the school is:**

<b>Designated Safeguarding Lead (DSL)</b> for the school	
Name	Luke Stone
Email Address	<a href="mailto:Luke.stone@nas.org.uk">Luke.stone@nas.org.uk</a>
Telephone Number	01474 814878

4.3. The main responsibilities of the Designated Safeguarding Lead are set out in Appendix 1, and are in line with guidance taken from *Annex C, Keeping Children Safe in Education 2023*.

4.4. If the Designated Safeguarding Lead is unavailable the Deputy Designated Safeguarding Lead will carry out their duties.

<b>Deputy Designated Safeguarding Lead</b>	
Name	Adam Wadey
Email Address	<a href="mailto:Adam.wadey@nas.org.uk">Adam.wadey@nas.org.uk</a>
Telephone Number	01474 814878

<b>Deputy Designated Safeguarding Lead</b>	
Name	Lisa Waters
Email Address	<a href="mailto:Lisa.waters@nas.org.uk">Lisa.waters@nas.org.uk</a>
Telephone Number	01474 706054

<b>Deputy Designated Safeguarding Lead</b>	
Name	Ashleigh Henry
Email Address	<a href="mailto:Ashleigh.henry@nas.org.uk">Ashleigh.henry@nas.org.uk</a>
Telephone Number	01474 706054

Deputy Designated Safeguarding Lead	
Name	Francesca Shaxted
Email Address	<a href="mailto:Francesca.shaxted@nas.org.uk">Francesca.shaxted@nas.org.uk</a>
Telephone Number	01474 706054

Deputy Designated Safeguarding Lead	
Name	Natasha Baecke
Email Address	<a href="mailto:Natasha.baecke@nas.org.uk">Natasha.baecke@nas.org.uk</a>
Telephone Number	01474 706054

- 4.5. In this policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Lead where the Designated Safeguarding Lead is unavailable. However, the **ultimate responsibility for Safeguarding and Child Protection remains with the Designated Safeguarding Lead and cannot be delegated.**
- 4.6. Either the Designated Safeguarding Lead or deputy must be available to staff and pupils during the school day, either directly or by telephone. If the DSL is 'off-site', this must be communicated to all staff.
- 4.7. If both the DSL and Deputy DSL are not available, staff should share concerns with another member of the senior leadership team who should contact NAS Safeguarding Advisor for Children and Young People immediately should further advice/support be needed (see contact page for details).
- 4.8. The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead(s) must have undertaken the Local Authority Designated Safeguarding Lead training (including local inter-agency working), to provide them with the knowledge and skills required to carry out the role, and must attend full refresher training at two-yearly intervals (minimum), attend additional safeguarding training on key issues, and attend updates and briefings at least annually.
- 4.9. The Designated Safeguarding Lead (as a minimum) should also have undertaken **Prevent training and Online Safety training**, and be able to support the school with regards to their requirement under the Prevent Duty.

## 5. Duty of Employees, Trustees and Volunteers

- 5.1. Every employee, Trustee and School Governing Group member of the school as well as every volunteer who assists the school is under a general legal duty:
- 5.1.1. To protect children from abuse and neglect;
  - 5.1.2. To be aware of the school's child protection procedures and to follow them;

- 5.1.3. To know how to access and implement the school's child protection procedures, independently if necessary;
  - 5.1.4. To keep a sufficient record of any significant complaint, conversation or event in accordance with this policy; and
  - 5.1.5. To report any matters of concern to the Designated Safeguarding Lead.
- 5.2. The Charity's Board of Trustees and Independent Safeguarding Board ensure that the school's safeguarding arrangements take into account the procedures and practice of the Local Safeguarding Partners and *Keeping Children Safe in Education 2023*. The Board of Trustees will ensure that there are appropriate procedures and policies in place to support timely and appropriate action to be taken to safeguard a child and promote their welfare, and that regularly updated training takes place with all staff and volunteers. Trustees will ensure that Safer Recruitment principles are adhered to in accordance with *Part 3, Keeping Children Safe in Education 2023*, including the additional requirement to undertake online searches for all shortlisted candidates - this is outlined in the Safer Recruitment Policy. The Board of Trustees will review any serious incidents and instruct a post-incident review with the support of NAS Safeguarding Lead to ensure all policies and procedures are being adhered to and have oversight of annual Safeguarding Audits conducted in all schools. The Board of Trustees ensure there are clear lines of accountability through the Safeguarding Quality Assurance Framework, which is completed and reviewed termly.
- 5.3. A designated teacher is appointed by the Principal to promote the educational achievement of children who are looked after / in care and previously looked after (**see 11.6 for contact details of the designated teacher for looked after children**). As the central point of contact for the school, the designated teacher will ensure appropriate and timely liaison with the Virtual School and where appropriate, the Virtual School Head.
- 5.4. The Trustees will ensure that staff have the skills, knowledge and understanding necessary to keep children in care/looked after children safe.
- 5.5. In particular, they will ensure that the information they need in relation to the child's legal looked after status, their care arrangements and the levels of authority delegated to the carers by the authority looking after them, is made available to them.

## 6. Training

### Induction

All staff, including temporary staff and volunteers, will be provided with induction training that includes:

- 6.1. This Policy;
- 6.2. The staff [Code of Conduct/Staff behaviour Policy/handbook] including the whistleblowing policy, staff Social Media/Acceptable Use Policy and the Behaviour Policy;
- 6.3. The school's Online Safety policy and practice, including the filtering and monitoring systems in place, how to use them, and how to ensure pupils are using the internet safely.

- 6.4. Role of the Designated Safeguarding Lead, their identity and contact details together with that of and the Deputy(ies);
- 6.5. Safeguarding procedures in response to children who go missing (as outlined in Appendix 4 of this policy);
- 6.6. A copy of 'Part 1 and Annex B of Keeping Children Safe in Education 2023'

### Child Protection and Safeguarding Training

- 6.7. All staff, Trustees and School Governing Group members will complete the training modules below (optional for Volunteers):
  - 6.7.1. Safeguarding and Child Protection training (iHasco level 1 equivalent including Online Safety), which will be updated annually;
  - 6.7.2. Keeping Children Safe in Education module on iHasco
- 6.8. All staff including the Principal will receive a copy of this policy and Part 1 and Annex B of *Keeping Children Safe in Education 2023*, the School's Code of Conduct/Staff Handbook and the Behaviour Policy and will be required to confirm that they have read and understood these. **A record of this will be kept for training and auditing purposes.**
- 6.9. The Principal and all staff members will undertake appropriate child protection training which will be updated annually and following consultation with the Kent Safeguarding Partners or the NSPCC. Training will include guidance on the duties of staff in relation to both children in need and children at risk of harm. In addition to all staff attending Safeguarding and Child Protection training, all staff will receive regular updates or staff meetings to keep their skills and knowledge up to date.
- 6.10. Staff development will also include training on online safety including the school's filtering and monitoring procedures and the requirement to ensure children are taught about online safety. **Please also refer to the Online Safety Policy SO-0106.**
- 6.11. Additionally, the school will assess the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as: radicalisation; child sexual exploitation; criminal exploitation including through 'County Lines'; female genital mutilation; cyberbullying; child on child abuse (including sexual violence and sexual harassment) and mental health.
- 6.12. All members of the NAS Education and Children's Services team, the School Governing Group members, and Trustees will undertake appropriate training annually to enable them to fulfil their safeguarding responsibilities.
- 6.13. All staff must complete the Autism awareness modules as part of their induction. All staff to be mindful of the additional vulnerabilities of Autistic individuals.

## 7. Whistleblowing

- 7.1. All staff are required to report concerns to the Principal. If the Principal is absent or if the allegation relates to the Principal, staff are required to report directly to NAS Director of Assurance and Compliance or NAS Safeguarding Lead.
- 7.2. Staff must report any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other

- serious harm. Whistleblowers must be reassured that a disclosure made in good faith will never lead to a detrimental position for their employment. A knowingly false disclosure however could lead to disciplinary action.
- 7.3. See Appendix 4 and the Whistleblowing Policy for full details of the procedures to be followed in relation to allegations against staff. All guidance stated in *Part 4 of Keeping Children Safe in Education 2023* regarding the management and record keeping of whistleblowing allegations must be followed, which includes liaison with the Local Authority Designated Officer as appropriate. Local Authority Designated Officer (LADO) contact information is detailed within section 11 of this policy.
- 7.4. All staff have access to SafeCall as an alternative method to raise a concern confidentially via phone: 0800 915 1571 or email: nas@safecall.co.uk

## 8. Safeguarding Expectations

### Cause for concern / Disclosure of harm or abuse

- 8.1. Every disclosure or suspicion of abuse from within or outside the school will be taken seriously and action taken in accordance with this policy.
- 8.2. The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in [Appendix 2](#).
- 8.3. Whilst all of our pupils are identified within the criteria for those potentially requiring Early Help (in accordance with KCSIE 2023), if a member of staff is concerned that a pupil may be in need of additional support via an Early Help Assessment or are concerned they are suffering harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible.
- 8.4. All staff should be aware that children may not be able to, feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened, this could be due to their vulnerability, disability and/or sexual orientation or language barriers. It is important to recognised that for some children, the abuse may be normalised and they are not aware that it is abuse/harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people giving opportunities and facilitating communication.
- 8.5. If, at any point, there is a risk of immediate harm to a child a referral should be made to children's social care immediately and Police if necessary. Prior to making the referral, attempts to consult with parents/carers should be made unless there are reasonable grounds for suspecting that in doing so, the pupil will be at risk of further harm. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Contact details of local children's social care can be found in section 11 of this policy. Children's social care have a statutory duty to provide a response to any referrals made however when this has not been received in a timely manner, the school must continue to pursue the response with urgency.

- 8.6. No single person working with children can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 8.7. All staff are particularly reminded:
  - 8.7.1. From October 2015, in accordance with section 5B of the *Female Genital Mutilation Act 2003*, teachers must personally report to the Police, 'known' cases of FGM, cases where they discover that an act of female genital mutilation appears to have been carried out, or a child/young person discloses it has taken place. The teacher should also discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate.
  - 8.7.2. Under the Prevent Duty Guidance: England and Wales (2023) concerns about children who may be susceptible to being drawn into terrorism must be reported to the school's Designated Safeguarding Lead, who will make a referral as appropriate in line with the Local Authority protocol.

### Autistic children and young people can face additional safeguarding challenges because:

- 8.8. there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's diagnosis without further exploration;
- 8.9. these children being more prone to peer group isolation or bullying/child on child abuse (including prejudice-based bullying) than other children;
- 8.10. there is potential that children with SEND or certain medical conditions can be disproportionately impacted by behaviours such as bullying/child on child abuse without outwardly showing any signs, pupils may hide or mask the difficulties they experience; and
- 8.11. there may be communication barriers and children and young people's communication may not be understood by the adults around them;
- 8.12. and difficulties in managing or reporting these challenges.

### At our school we identify pupils who might need more support to be kept safe or to keep themselves safe by:

- 8.13. ensuring the DSL and SENCo work closely, sharing information regarding concerns relating to pupils/pupils;
- 8.14. pastoral support is targeted as required;
- 8.15. Where possible pupils' voices and views are regularly captured, adaptations are made and resources used to capture the 'voice' which may be non-verbal;
- 8.16. all notable changes in behaviour, mood or presentation are reported to the DSL;
- 8.17. all unexplained injuries and injuries for which there have been where conflicting explanations are reported to the DSL.



## 9. Early Help

- 9.1. In accordance with *Keeping Children Safe in Education 2023* and chapter 1 of *Working Together to Safeguarding Children 2018*, all staff should be prepared to identify children and young people 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.
- 9.2. As outlined in *Keeping Children Safe in Education 2023* Staff should, in particular, be alert to the potential need for Early Help for a child who:
  - 9.2.1. is disabled and/or has specific additional needs;
  - 9.2.2. has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
  - 9.2.3. is a young carer;
  - 9.2.4. is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - 9.2.5. is frequently missing/goes missing from care or from home;
  - 9.2.6. is at risk of modern slavery, trafficking or exploitation;
  - 9.2.7. is at risk of being radicalised or exploited;
  - 9.2.8. is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
  - 9.2.9. is misusing drugs or alcohol themselves;
  - 9.2.10. has returned home to their family from care;
  - 9.2.11. is a privately fostered child.
- 9.3. In the first instance staff should discuss Early Help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in completing an Early Help Assessment.
- 9.4. All staff must be aware of the Early Help process which includes Identifying an emerging problem, liaising with the Designated Safeguarding Lead, sharing information and in some cases, acting as the lead professional in undertaking early help assessments.
- 9.5. If Early Help and or other support is appropriate, the case should be kept under constant review by the identified lead professional under the supervision of the Designated Safeguarding Lead and consideration given to a referral to children's social care if the child or young person's situation doesn't appear to be improving. Details of the local authority's Early Help Hub/Team can be found in the Contacts section of this policy.
- 9.6. Schools should be conscious that each local authority can have different procedures and support available around Early Help, and that the procedures of the child's home/placing local authority should be followed where a child comes from out of area.

## 10. Mental Health

- 10.1. Research suggests that Autistic children, young people, and adults are at increased likelihood to experience mental health concerns such as anxiety and depression.

- 10.2. Pupils may feel anxious in their day-to-day lives due to navigating social and sensory environments that might be difficult or challenging. Research suggests autistic people are more prone to experiencing anxiety and estimates that up to half of all autistic people experience high levels of anxiety on a regular basis.
- 10.3. School staff need to be alert to all pupils' mental health needs and consider what additional support may be needed.
- 10.4. School staff need to be alert to changes in a pupil's mental health and be curious as to what may be causing this.
- 10.5. All staff should also be 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.
- 10.6. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, 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.
- 10.7. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- 10.8. **Any concerns in relation to the mental health of our children and young people should be raised with the DSL, the school's Mental Health Lead and in some cases the SENCo also, without delay to ensure children and young people can access the right support at the right time.**

## 11. Dealing with Allegations Against Staff, Trustees and Volunteers

- 11.1. The school has procedures for dealing with allegations against staff (including agency/supply), Trustees and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff (including agency/supply), Trustees and volunteers from false or unfounded allegations. These procedures are set out in **Appendix 4** and follow the DfE guidance found in Part 4 of Keeping Children Safe in Education 2023.
- 11.2. The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s) also known as LADO).
- 11.3. The designated officer(s)/LADO must be informed immediately and in any event within one working day of all allegations against staff (including supply), Trustees and volunteers that come to the school's attention and meet the criteria set out in paragraph 1 of Appendix 4.



- 11.4. Any allegation against staff must be directly alerted to relevant individuals including the Director of Education and Children's Services and the Safeguarding Advisor for Children & Young People.
- 11.5. Detailed guidance is given to staff, Trustees and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Manual or Staff Code of Conduct.

## 12. Allegations Against Pupils / Responses to Child on Child Abuse

- 12.1. This section should be read in conjunction with the NAS Anti-Bullying Policy.
- 12.2. For the purposes of this policy, our language will replicate that used in Keeping Children Safe in Education 2023: *'For the purposes of this guidance, we, in places, use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. For the purpose of this advice, we, in places, use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. These are widely used and recognised terms and the most appropriate to aid effective drafting of guidance. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.'*
- 12.3. Children can abuse other children (often referred to as child on child or peer on peer abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports (see Appendix 2).
- 12.4. All pupils are to be reassured that any allegations of abuse will be taken seriously and that they will be supported and kept safe. Victims must never be given the impression that they are creating a problem or made to feel ashamed for making a report.
- 12.5. With regard to child on child sexual abuse, whilst statistically it is reported that it is more likely that girls may be victims and boys' perpetrators, all child-on-child abuse is unacceptable and will be taken seriously.
- 12.6. Staff will be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation and hazing type violence with respect to boys.
- 12.7. All pupils can raise concerns confidentially regarding child on child abuse directly with the Designated Safeguarding Lead or Deputies via face to face

- discussions, My Child at School communication or email. Email addresses can be found on all safeguarding posters around the school.
- 12.8. It is important to acknowledge that pupils may not be able to share concerns about child on child abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may never make a direct report.
- 12.9. Where concerns have been raised by anyone regarding child on child abuse, children will be enabled to share their feelings in their known preferred communication method with a person they can trust, such as a parent, teacher, relative, friend or advocate.
- 12.10. It is understood at the school, that even if there are no reports in the school, it does not mean it is not happening. It may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to the Designated Safeguarding Lead (or Deputy) to ensure it is dealt with immediately and report into CPOMS.
- 12.11. At the school we will not tolerate abuse between pupils. All staff understand the importance of challenging behaviour between pupils that is harmful, inappropriate and/or abusive in nature. Abuse should also not be excused as part of behaviours associated with their diagnosis. Downplaying certain behaviours for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys will be boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and a culture that normalises abuse. This will not be tolerated in the school and may lead to disciplinary action being taken.
- 12.12. Child on child abuse in the form of prejudice-based and discriminatory bullying will not be tolerated, please refer to NAS Anti-Bullying Policy for further guidance.
- 12.13. All staff will be made aware of the heightened vulnerability of LGBTQ+ children and young people, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.
- 12.14. The initial response to a report from a child is incredibly important. How staff respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.  
**See Appendix 2.**
- 12.15. All allegations regarding child on child abuse are to be reported in accordance with the procedures set out in this policy (see Appendix 2). A pupil against whom an allegation of abuse has been made may need to be suspended from the school during the investigation in order to ensure their safety and the safety of other pupils. The school's Behaviour Policy will apply. If the allegation is in relation to sexual violence or sexual harassment, guidance set out in *part 5 of Keeping Children Safe in Education 2023* will be followed.

- 12.16. The school will take advice from children's social care services and Police as appropriate, on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- 12.17. Rape, assault by penetration, and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The Police will take a welfare, rather than a criminal justice approach, in these cases.
- 12.18. Where an allegation is made against a pupil, both the victim and the alleged perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. See Appendix 2.

## 13. Missing Child and Children Missing or Absent from Education

### Introduction

- 13.1. Knowing where children are during school hours is an extremely important aspect of safeguarding – refer to **Appendix 5 of this Policy for Safeguarding Responses to Missing Pupils**.
- 13.2. Children missing from school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay.
- 13.3. Current allocated social workers **must** be consulted on any issues in relation to attendance for the children they are supporting, including: responding to unauthorised absence or when the child is missing education.
- 13.4. In managing attendance, the following actions represent standard practice:
  - 13.4.1. We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers/Emergency contacts. Parents should remember to update the school as soon as possible if the numbers change.
  - 13.4.2. All staff are informed of the school **Missing Pupil Procedure** which can be found in **Appendix 5** of this Policy. This procedure is to be used for searching for, and if necessary, reporting, any pupil missing from the school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.
- 13.5. The school shall inform the relevant local authority of any pupil who does not attend the school regularly, has a pattern of absence, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

## Children Missing or Absent from Education

- 13.6. The school recognises that autistic children and young people are at increased risk of being missing or absent from education and need appropriate support in place to access school. Please refer to **Appendix 6** for procedure.
- 13.7. The school recognises that a child going missing from education is a potential indicator of abuse or neglect, and will follow guidance from *Annex B, Keeping Children Safe in Education 2023* and '*Children Missing Education*' 2016 to promote their safety and wellbeing. The procedures in this policy will be followed when dealing with children who go missing from education, particularly on repeat occasions, to help to identify the risk of abuse and neglect and to help prevent the risks of them going missing in the future.
- 13.8. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. We will closely monitor pupils' attendance in order to identify persistently absent pupils or new patterns of absence in order to protect children from missing more education or being exposed to contextual safeguarding concerns.
- 13.9. Where a child is going to be deleted from the pupil roll, the school will inform the local authority in which the child resides in the applicable circumstances.
- 13.10. Where a parent notifies a school that a pupil will live at another address, all schools are required to record in the admissions register:
- 13.10.1. The full name of the parent with whom the pupil will live;
  - 13.10.2. The new address; and
  - 13.10.3. The date from when it is expected the pupil will live at this address.

## School Transfers

- 13.11. Where a parent of a pupil notifies the school that the pupil is registered at another school or will be attending a different school in future, schools must record in the admission register:
- 13.11.1. The name of the new school; and
  - 13.11.2. The date on which the pupil first attended or is due to start attending the new school.
- 13.12. Where children leave the school (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.

## Home Education

- 13.13. Where a parent has expressed their intention to Home Educate their child, in *Keeping Children Safe in Education 2023* it advises that local authorities,

schools, and other key professionals should work together to coordinate a meeting with parents and carers where possible, to discuss what support can be put into place to either support the child to remain in school or to discuss next steps. This meeting will ensure that parents and carers have considered what is in the best interests of each child. *Keeping Children Safe in Education 2023* emphasises that this is particularly important where a child has SEND, is vulnerable, and/or has a social worker. This meeting will be arranged by the Principal and any details regarding the meeting and any documentation relating to the request for Elective Home Education (EHE) will be recorded on CPOMS.

- 13.14. Where a parent Elects to Home Educate their child, schools must:
  - 13.14.1. Delete the child's name from their admissions register upon receipt of written notification from the parents that the pupil is receiving education otherwise than at school. However, schools should not wait for parents to give written notification that they are withdrawing their child from school before advising their local authority.
  - 13.14.2. Schools must make a return (giving the child's name, address and the ground upon which their name is to be deleted from the register) to the local authority as soon as the ground for deletion is met, and no later than deleting the pupil's name from the register. They should also copy parents into the notice to the local authority.
  - 13.14.3. See DfE guidance [Elective Home Education](#) for more information.

### Alternative Provision

- 13.15. When placing a child or young person with an alternative provider, the school / service will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.
- 13.16. The school will remain responsible for a child or young person's welfare during their time at an alternative provider.
- 13.17. This responsibility includes monitoring of attendance and involvement in management of safeguarding concerns where appropriate.

### Work Experience

- 13.18. When a child / young person is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.
- 13.19. The school will remain responsible for a child or young person's welfare during their time at an alternative provider.
- 13.20. This responsibility includes monitoring of attendance and involvement in management of safeguarding concerns where appropriate.

## 14. Informing Parents and Carers

- 14.1. Parents and carers will normally be kept informed, as appropriate, of any action to be taken under these Safeguarding procedures. However, there

- may be circumstances when the Designated Safeguarding Lead will need to consult the Principal, the designated officer (LADO), local authority children's social care services and / or the Police before discussing details with parents.
- 14.2. In relation to Prevent referrals, the Designated Safeguarding Lead will consider seeking the consent of the pupil and their parent/guardian when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.
  - 14.3. In relation to online safety, parents and carers will be informed of the systems that are in place to monitor and filter online content in school, how the school plans to use online material in the curriculum, and who from the school pupils may be interacting with online.
  - 14.4. Where concerns are raised about a pupil's use of the internet or access to online content, parents and carers will be consulted prior to any action being taken such as confiscation of devices.
  - 14.5. Risk assessments of a pupil's needs will be done in consultation with parents and carers.
  - 14.6. The school will take a collaborative approach with parents and carers, working together to help keep pupils safe both at school as well as at home and in the community.
  - 14.7. The school will assess and support all families, including consideration of whether support should be offered under the Early Help framework (see section X).
  - 14.8. See also **Appendix 3** for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Principal of the school, based on guidance from *Part 4, Keeping Children Safe in Education 2023*.

## 15. Secure School Premises

- 15.1. The school will take all practicable steps to ensure that school premises are as secure as circumstances permit and safe for our staff and children.
- 15.2. Daily checks are conducted by the site team to ensure the site is safe and secure prior to opening each morning.
- 15.3. Staff and visitors are to sign in using the Inventory system upon arrival. Photographic ID will need to be seen and a valid in date Enhanced DBS certificate will need to be shown.
- 15.4. When the school premises/facilities are hired or rented by an organisation or individual (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), the Designated Safeguarding Lead will work alongside the [School Business Manager / Site team / Principal] to ensure appropriate arrangements are in place to keep children safe.
- 15.5. External providers'/organisations' own Child Protection policies and procedures should be provided to the school and in liaison with the Designated Safeguarding Lead, agree how and when to report any concerns to the school.



- 15.6. Safeguarding requirements will be documented within any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of premises; and that failure to comply with this would lead to termination of the agreement.

## Personal Electronic Devices

- 15.7. Staff are not permitted to have their mobile phones / similar devices (such as smart watches) turned on, unless they have the express permission of the Principal.
- 15.8. Under no circumstances are photographs or videos to be taken of pupils on a personal device.
- 15.9. Photographs may only be taken of pupils on school devices with the express permission of the Principal.
- 15.10. Photographs and videos of the people we support remain the property of the individual and cannot be used externally without the individual/parental permission in writing. NAS Photo Permission forms are available and should be completed by the pupil or parent/ carer (whichever relevant).
- 15.11. Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.
- 15.12. Where photographs and videos will involve pupils who are looked after, adopted pupils, or pupils for whom there are security concerns, the Principal will liaise with the DSL to determine the steps involved.
- 15.13. The DSL will, in known cases of pupils who are looked after or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.
- 15.14. Visitors may not photograph pupils and may only photograph buildings with consent of the school.
- 15.15. Staff are not permitted to show any images from their personal mobile phone to pupils.
- 15.16. Staff will adhere to the Online Safety Policy at all times.
- 15.17. The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Personal Electronic Devices Policy.
- 15.18. Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to using the school's reporting procedure

## 16. Confidentiality and Information Sharing

- 16.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The school has clear powers to share, hold and use information for these purposes.

- 16.2. Concerns 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, which must always be the paramount concern. The school will share any safeguarding concern internally to the relevant people (Safeguarding Team) and externally to our safeguarding partners using secure networks or password protected documents.
- 16.3. The school will keep all Child Protection and Safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children.
- 16.4. The school will co-operate with the Local Safeguarding Partnership, Police and local authority children's social care services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the *Children Act 1989* in accordance with the requirements of:
- 16.4.1. *Keeping Children Safe in Education 2023*
  - 16.4.2. *Working Together to Safeguard Children 2023*
  - 16.4.3. *Prevent Duty Guidance: England and Wales 2023*
  - 16.4.4. *Channel Duty Guidance: Protecting People Susceptible to Radicalisation 2023*
- Government advice: *Information sharing advice for safeguarding practitioners 2023*
- 16.5. Where allegations have been made against staff, the school will consult with the designated officer and, where appropriate, the Police and local authority children's social care services to agree the information that should be disclosed and to whom.

## 17. Monitoring

- 17.1. Principals and DSLs will undertake weekly CPOMS 7-day report monitoring to review all incidents recorded, categories effectively applied and ensuring all actions are recorded and are effective.
- 17.2. When monitoring and reviewing concerns, Principals and DSLs will ensure that concerns have been appropriately escalated to and acknowledged by internal channels, (such as Near Misses, Health and Safety concerns, Behavioural concerns, and Safeguarding concerns) as well as external agencies.
- 17.3. Any serious incidents at the school will be followed by a Post-Incident review, which includes a review of the safeguarding procedures within the school and a prompt report to the relevant NAS teams and/or School Governing Group. Where an incident involves a member of staff, the designated officer (LADO) will assist in this review to determine whether any improvements can be made to the school's procedures.
- 17.4. In addition, the Designated Safeguarding Lead will monitor the operation of this policy and its procedures and will make an annual report to the local committee.
- 17.5. Trustees and the Independent Safeguarding Board will undertake an annual review of this policy and its procedures and of the efficiency with which the relevant duties have been discharged.



- 17.6. Trustees and the Independent Safeguarding Board will ensure that any deficiencies or weaknesses in regards to child protection and Safeguarding arrangements are remedied without delay.

## 18. Equality Impact Assessment

- 18.1. School employees and volunteers shall not discriminate against any person on the grounds of race, nationality, age, religious or similar philosophical beliefs, sexual orientation, or social standing and shall work in such a way as to give equal opportunity for each person we support to achieve the maximum benefit and potential, consistent with respecting the dignity and value of fellow human beings.
- 18.2. In the design of this policy we have considered the complex inter-relating elements that impact on effective support and safeguarding of children and young people with Autism. Our implementation of this policy should seek to lessen some of the known inequalities that exist in society, including, but not limited to race, disability and gender. Through carefully designed provision and support that affords opportunities for people with those protected characteristics to receive equality of access to all aspects of safeguarding provision. This policy has been designed and consulted on with a large stakeholder group internal to the NAS, including schools and residential based staff.
- 18.3. The welfare of the child is paramount and everyone's responsibility and all children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

## 19. Contacts

<b>Designated Safeguarding Lead (DSL) for the school</b>	
Name	Luke Stone
Email Address	<a href="mailto:Luke.stone@nas.org.uk">Luke.stone@nas.org.uk</a>
Telephone Number	01474 814878

<b>Deputy Designated Safeguarding Lead</b>	
Name	Adam Wadey
Email Address	<a href="mailto:Adam.wadey@nas.org.uk">Adam.wadey@nas.org.uk</a>
Telephone Number	01474 814878

<b>Deputy Designated Safeguarding Lead</b>	
Name	Lisa Waters
Email Address	<a href="mailto:Lisa.waters@nas.org.uk">Lisa.waters@nas.org.uk</a>
Telephone Number	01474 706054

<b>Deputy Designated Safeguarding Lead</b>	
Name	Ashleigh Henry
Email Address	<a href="mailto:Ashleigh.Henry@nas.org.uk">Ashleigh.Henry@nas.org.uk</a>
Telephone Number	01474 814878

<b>Deputy Designated Safeguarding Lead</b>	
Name	Francesca Shaxted
Email Address	<a href="mailto:Francesca.shaxted@nas.org.uk">Francesca.shaxted@nas.org.uk</a>
Telephone Number	01474 814878

<b>Deputy Designated Safeguarding Lead</b>	
Name	Natasha Baecke
Email Address	<a href="mailto:Natasha.baecke@nas.org.uk">Natasha.baecke@nas.org.uk</a>

Telephone Number	01474 814878
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<b>NAS Safeguarding Lead and Responsible Individual</b>	
Name	Danielle Wilson
Email Address	<a href="mailto:Danielle.wilson@nas.org.uk">Danielle.wilson@nas.org.uk</a>

<b>NAS Safeguarding Advisor for Children &amp; Young People</b>	
Name	Fenella Cannings-Jurd
Email Address	<a href="mailto:Fenella.cannings-jurd@nas.org.uk">Fenella.cannings-jurd@nas.org.uk</a>

<b>NAS Lead Trustee for Safeguarding</b>	
Name	Pamela Marsden
Email Address	<a href="mailto:Pamela.marsden@nas.org.uk">Pamela.marsden@nas.org.uk</a>

<b>Local Authority Designated Officer (LADO)</b>	
Local Authority Name	The County Lado Service
Email Address	<a href="mailto:kentchildrenslado@kent.gov.uk">kentchildrenslado@kent.gov.uk</a>
Telephone Number	03000 410888

The telephone numbers of the Kent Children's Social Care departments are as follows:

<b>Department</b>	<b>Contact Telephone Number</b>	<b>Contact Email</b>
<b>Main referral (MASH/Front Door)</b>	03000 41 11 11	<a href="mailto:Frontdoor@kent.gov.uk">Frontdoor@kent.gov.uk</a>
<b>Out of Hours/Emergency Duty Team</b>	03000 41 91 91	
<b>Early Help</b>	03000 41 39 91 (North Kent)	<a href="mailto:GraveshamEarlyHelp@kent.gov.uk">GraveshamEarlyHelp@kent.gov.uk</a>

The telephone numbers of relevant **Prevent** partners are as follows:

<b>Channel Police Practitioner</b>	
Name	Sally Green
Email Address	<a href="mailto:Sally.green2@kent.gov.uk">Sally.green2@kent.gov.uk</a>

<b>Channel Local Authority Chair</b>	
Name	Nick Wilkinson
Email Address	<a href="mailto:Nick.wilkinson@kent.gov.uk">Nick.wilkinson@kent.gov.uk</a>

The following telephone numbers may be useful for pupils/staff:

<b>School Principal</b>	
Name	Adam Wadey
Email Address	<a href="mailto:Adam.wadey@kent.gov.uk">Adam.wadey@kent.gov.uk</a>
Telephone Number	01474 814878

<b>Designated Teacher for Looked After or previously Looked After Children</b>	
Name	Adam Wadey
Email Address	<a href="mailto:Adam.wadey@kent.gov.uk">Adam.wadey@kent.gov.uk</a>
Telephone Number	01474 814878

<b>Mental Health Lead</b>	
Name	Adam Wadey
Email Address	<a href="mailto:Adam.wadey@kent.gov.uk">Adam.wadey@kent.gov.uk</a>
Telephone Number	01474 814878

<b>Other Useful Contacts</b>	
NSPCC Childline	0800 1111
NSPCC	0808 800 5000 ( <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> )
Ofsted's Whistleblower Hotline	0300 123 3155

NSPCC Whistleblowing Helpline	0800 028 0285
NSPCC FGM Helpline	0800 028 3550
NSPCC Gangs Helpline	0808 800 5000
Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk Monday to Friday, 9am to 5pm Out of hours: 020 7008 1500 (ask for the Global Response Centre)

## 20. Appendix 1 - Role of the Designated Safeguarding Lead

The main responsibilities of the Designated Safeguarding Lead are outlined in full within *Annex C Keeping Children Safe in Education 2023* and summarised below:

- 20.1. To be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of safeguarding and child protection;
- 20.2. To co-ordinate the safeguarding and child protection procedures in the School;
- 20.3. To advise and act upon all suspicion, belief and evidence of abuse reported to them;
- 20.4. To encourage a culture of listening to children, being alert to the different ways autistic children may communicate their concerns, wishes and feelings;
- 20.5. To liaise with and manage referrals to all relevant agencies in a timely manner and where necessary:
  - 20.5.1. Referring to social care or supporting staff who make referrals
  - 20.5.2. Referring Prevent concerns to the appropriate authority
  - 20.5.3. Where a person is dismissed or left due to risk/harm to a child, referring to the Disclosure and Barring Service and Teaching Regulation Agency (TRA) as required
  - 20.5.4. Where a crime may have been committed to the Police. See [NPCC When to Call the Police](#) guidance.
- 20.6. To ensure that all members of staff and volunteers receive training of appropriate frequency and content relating to safeguarding (including online safety), child protection and safer recruitment procedure, including induction for those staff who start at different points of the school year, and to keep and maintain records of this training;
- 20.7. To ensure the school's Child Protection policies are known, understood and used appropriately by all staff;
- 20.8. To ensure the school's Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly;
- 20.9. To ensure the Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- 20.10. To liaise with the Local Authority Designated Officer (LADO), the local authority children's social care services and other external agencies on behalf of the school;
- 20.11. Keep the Principal informed of all actions unless the Principal is the subject of a complaint (see **Appendix 4** for the procedures for dealing with allegations against staff);
- 20.12. To monitor the keeping, confidentiality and storage of records in relation to child protection;
- 20.13. To monitor records of pupils in the school who are subject to a Child Protection plan/Child in Need Plan to ensure that this is maintained and updated as notification is received;

- 20.14. To liaise with other professionals to ensure that children who are subject to Child Protection plans are monitored and to take part in Child Protection conferences or reviews.
- 20.15. To ensure the secure transfer of the Child Protection file when a child leaves the school (including in year transfers). The Child Protection file should be transferred to the new school or college as soon as possible, and within 5 days of an in-year transfer or within the first 5 days of the start of a new term.
- 20.16. To liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- 20.17. To understand and recognise the additional risks that children with special educational needs and disabilities (SEND) can face, including online.
- 20.18. To promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- 20.19. To work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
  - 20.19.1. ensure that the school knows who its cohort of children who have or have previously had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - 20.19.2. support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have previously had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- 20.20. In accordance with the *Prevent Duty Guidance: England and Wales (2023)* and *Channel Duty Guidance: Protecting People Susceptible to Radicalisation (2023)* the Designated Safeguarding Lead has, in addition, the following responsibilities:
  - 20.20.0. Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
  - 20.20.1. Coordinating Prevent duty procedures in the school;
  - 20.20.2. Liaising with local Prevent coordinators, the Police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the Police where indicated;
  - 20.20.3. Undergoing in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. It is recommended that this training is updated at least every two years;
  - 20.20.4. Maintaining on-going training programme for all school employees regarding the risk of terrorism and extremism, including induction

- training for all new employees and keeping records of staff training;  
and
- 20.20.5. Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.
- 20.21. The Deputy Designated Safeguarding Lead will carry out this role where the Designated Safeguarding Lead is unavailable. The ultimate responsibility for Safeguarding and Child Protection remains with the Designated Safeguarding Lead and cannot be delegated.

## 21. Appendix 2 – Recognising Types and Signs of Abuse and Neglect

### Types of Abuse and Neglect

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

- 21.1. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional 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. They may be abused by an adult or adults or by another child or children. Part one of *Keeping children safe in education 2023* defines the following types of abuse
- 21.2. **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.
- 21.3. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 21.4. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral



sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

- 21.5. **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.

### Specific Safeguarding Issues

*Keeping Children Safe in Education 2023* acknowledges the following as specific safeguarding issues:

- 21.6. Abuse including faith-based abuse;
- 21.7. Bullying including cyberbullying;
- 21.8. Child abduction and community safety incidents;
- 21.9. Children and the court system;
- 21.10. Children missing from education;
- 21.11. Children missing from home or care;
- 21.12. Children with family members in Prison;
- 21.13. Child sexual exploitation;
- 21.14. Child exploitation: criminal exploitation including through county lines and trafficking;
- 21.15. Domestic abuse;
- 21.16. Drugs;
- 21.17. Health and wellbeing – including Fabricated and Induced illness, Medical conditions and Mental health concerns;
- 21.18. So-called 'Honour based Abuse'– including Female genital mutilation (FGM), Forced Marriage and Breast Flattening (or Breast Ironing);
- 21.19. Homelessness;
- 21.20. Online safety;
- 21.21. Private fostering;
- 21.22. Radicalisation and Hate;
- 21.23. Child on Child abuse. All staff should be aware that safeguarding issues can manifest themselves via Child on Child abuse.
- 21.24. Sexual Violence and Sexual Harassment between children in schools;
- 21.25. Upskirting;

- 21.26. Violence – including Gangs and youth violence and Gender-based violence / violence against women and girls.
- 21.27. Annex B of *Keeping Children safe in Education 2023* contains important additional information about specific forms of abuse and safeguarding issues. School staff who work directly with children are expected to read both Annex A and part one of KCSIE alongside this policy at least annually.
- 21.28. Training must incorporate opportunities for staff to understand how to recognise and respond to the wide range of issues.
- 21.29. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and consensual or non-consensual sharing of nudes or semi-nude images or videos put children in danger.

### Signs of Abuse

Possible signs of abuse include, but are not limited to:

- 21.30. The pupil says they has been abused or asks a question or makes a comment which gives rise to that inference;
- 21.31. There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- 21.32. The pupil's behaviour stands out as either being extremely withdrawn, extremely challenging, or there is a sudden or significant change in the pupil's behaviour;
- 21.33. The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- 21.34. The pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- 21.35. The pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- 21.36. The pupil is reluctant to go home, or has been openly rejected by their parents or carers.
- 21.37. Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 21.38. The local Safeguarding partnership can provide advice on the signs of abuse and the DfE advice *What to do if you're worried a child is being abused (2015)* provides advice in identifying child abuse. The [NSPCC website](#) is also a good source of information and advice.

### Domestic Abuse

- 21.39. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a

detrimental and long-term impact on their health, well-being, development, and ability to learn.

- 21.40. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.
- 21.41. Where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young alleged perpetrators should be offered support.

### Private Fostering

- 21.42. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their home, with the intention that it should last for 28 days or more.
- 21.43. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or great-uncles, great grandparents or cousins.
- 21.44. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.
- 21.45. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.
- 21.46. **Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.** Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- 21.47. School staff should notify the Designated Safeguarding Lead (DSL) when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.
- 21.48. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### "Honour" Based Abuse

- 21.49. So-called 'honour-based' Abuse (HBA) 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. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

- 21.50. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.
- 21.51. Staff need to be aware that since February 2023 it has 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.

### Female Genital Mutilation (FGM)

- 21.52. FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. This practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.
- 21.53. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.
- 21.54. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.
- 21.55. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and children's social care.
- 21.56. Risk factors for FGM include:
  - 21.56.1. Low level of integration into UK society;
  - 21.56.2. Mother or a sister who has undergone FGM;
  - 21.56.3. Girls who are withdrawn from PSHE;
  - 21.56.4. Visiting female elder from the country of origin;
  - 21.56.5. Being taken on a long holiday to the country of origin;
  - 21.56.6. Talk about a 'special' procedure to become a woman.
- 21.57. **Signs of FGM.** FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Indications that FGM may have already taken place may include:
  - 21.57.1. Difficulty walking, sitting or standing and may even look uncomfortable;
  - 21.57.2. Spending longer than normal in the bathroom or toilet due to difficulties urinating;
  - 21.57.3. Spending long periods of time away from a classroom during the day with bladder or menstrual problems;
  - 21.57.4. Frequent urinary, menstrual or stomach problems;

- 21.57.5. Prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
  - 21.57.6. Reluctance to undergo normal medical examinations;
  - 21.57.7. Confiding in a professional without being explicit about the problem due to embarrassment or fear;
  - 21.57.8. Talking about pain or discomfort between her legs.
- 21.58. **All staff must be aware of the requirement for teachers to 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.**
- 21.59. **Those failing to report such cases will face disciplinary sanctions.**
- 21.60. It will be rare for teachers to see visual evidence, and they should not be examining pupils. This mandatory reporting duty commenced in October 2015.
- 21.61. Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate. All staff will utilise Appendix 3 of [Female Genital Mutilation Guidance for Schools July 2019](#) to ensure appropriate action is taken and conversations are recorded appropriately/in line with Guidance.

### Contextual Safeguarding

- 21.62. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families/home. Extra-familial harms or 'risks outside of the home', 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. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 21.62.1. Children's social care assessments should consider such factors so it is important that schools 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.

### Child Criminal Exploitation (CCE) and County Lines

- 21.63. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of

- technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 21.64. **County lines** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".
- 21.65. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 21.66. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.
- 21.67. Some additional indicators that may be present when a child is criminally exploited through county lines are children who:
- 21.67.0. Go missing and are found in areas away from their home;
  - 21.67.1. Have been the victim or perpetrator of serious violence (e.g. Knife crime);
  - 21.67.2. Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
  - 21.67.3. Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
  - 21.67.4. Are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity;
  - 21.67.5. Owe a 'debt bond' to their exploiters;
  - 21.67.6. Have their bank accounts used to facilitate drug dealing.
- 21.68. Like other forms of abuse, CCE and county lines:
- 21.68.1. Can affect any child or young person (male or female) under the age of 18 years;
  - 21.68.2. Can affect any vulnerable adult over the age of 18 years;
  - 21.68.3. Can still be exploitation even if the activity appears consensual;



- 21.68.4. Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- 21.68.5. Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- 21.68.6. 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.

### Child Sexual Exploitation (CSE)

- 21.69. **Child sexual exploitation (CSE)** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.
- 21.70. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- 21.71. Indicators of child sexual exploitation may include:
  - 21.71.0. Appearing with unexplained gifts, money, clothes, mobile phones, etc. without plausible explanation;
  - 21.71.1. Gang-association and/or isolation from peers/social networks;
  - 21.71.2. Exclusion or unexplained absences from school, college or work;
  - 21.71.3. Leaving home/care without explanation and persistently going missing or returning late;
  - 21.71.4. Excessive receipt of texts/phone calls;
  - 21.71.5. Returning home under the influence of drugs/alcohol;
  - 21.71.6. Inappropriate sexualised behaviour for age/sexually transmitted infections;
  - 21.71.7. Evidence of/suspicions of physical or sexual assault;
  - 21.71.8. Relationships with controlling or significantly older individuals or groups;
  - 21.71.9. Multiple callers (unknown adults or peers);
  - 21.71.10. Frequenting areas known for sex work;
  - 21.71.11. Concerning use of internet or other social media;
  - 21.71.12. Increasing secretiveness around behaviours;
  - 21.71.13. Self-harm or significant changes in emotional well-being.
- 21.72. **Potential Vulnerabilities.** Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with

these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- 21.72.0. Having a prior experience of neglect, physical and/or sexual abuse;
  - 21.72.1. Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
  - 21.72.2. Recent bereavement or loss;
  - 21.72.3. Social isolation or social difficulties;
  - 21.72.4. Absence of a safe environment to explore sexuality;
  - 21.72.5. Economic vulnerability;
  - 21.72.6. Homelessness or insecure accommodation status;
  - 21.72.7. Connections with other children and young people who are being sexually exploited;
  - 21.72.8. Family members or other connections involved in adult sex work;
  - 21.72.9. Having a physical or learning disability;
  - 21.72.10. Being in care (particularly those in residential care and those with interrupted care histories);
  - 21.72.11. Sexual identity.
- 21.73. More information can be found in: *Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)*.

### Child on Child Abuse

- 21.74. All staff should be aware safeguarding issues can manifest themselves via child on child abuse.
- 21.75. This is most likely to include, but not limited to:
- 21.75.0. bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - 21.75.1. abuse in intimate personal relationships between peers;
  - 21.75.2. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include online which facilitates threatens and/or encourages physical abuse);
  - 21.75.3. sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens an/or encourages sexual violence)
  - 21.75.4. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse;
  - 21.75.5. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
  - 21.75.6. gender-based violence
  - 21.75.7. consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
  - 21.75.8. upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their



- genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- 21.75.9. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 21.76. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.
- 21.77. We believe that all children and young people have a right to attend school and learn in a safe environment. Children and young people should be free from harm by adults in the school and other pupils.
- 21.78. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.
- 21.79. All allegations of child on child abuse should be reported **immediately** to the DSL. The DSL will consider the need for agency involvement which may include Police and or Social Care depending on the allegation – see appendix 2 points 4 & 5.
- 21.80. The DSL will be mindful of support and supervision needs of both the victim and the alleged perpetrator, this will be discussed in consultation with the Principal and in line with *Part 5 of Keeping Children Safe in Education 2023*.

### Consensual and Non-Consensual Sharing of Nudes and Semi-Nude Images and/or Videos

- 21.81. Also known as Sexting or Youth produced sexual imagery.
- 21.82. We follow guidance given to schools and colleges by the UKCIS Education group [Sharing nudes and semi-nudes: Advice for Education settings December 2020](#) which outlines the steps to be taken – see part 4 and 5 of this Appendix.
- 21.83. An immediate referral to Police and/or children's social care should be made if at this initial stage:
- 21.83.0. The incident involves an adult.
- 21.83.1. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- 21.83.2. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent (see section 1.6 of *UKCIS Sharing nudes and semi nudes: Advice for Education* for guidance on assessing behaviour).
- 21.83.3. The images involves sexual acts and any pupil in the images or videos is under 13.
- 21.83.4. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

## Upskirting

- 21.84. Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim. It is a criminal offence under the *Voyeurism (Offences) Act 2019*, commonly referred to as the Upskirting Act. **Any reports of Upskirting will be reported to the DSL. The DSL will report the offence immediately to the Police and follow guidance as stated in this Policy.**

## Online Safety

- 21.85. See NAS Online Safety Policy SO0106 for guidance on whole school approach to Online safety which includes: Online safety coverage in the curriculum; Acceptable Use of technology; filtering and monitoring systems in place to support safe use of technology within school and how content, contact, conduct and commerce are monitored. **All online safety concerns (including online child on child abuse) must be reported to the DSL and recorded on CPOMS.**
- 21.86. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk known as the 4 C's (upon which the Online Safety Policy is based):
- 21.86.0. **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - 21.86.1. **Contact:** being subjected to harmful online interaction with other users; for example: child to 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'.
  - 21.86.2. **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, 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;
  - 21.86.3. **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. Concerns of this nature may be reported to the Anti-Phishing Working Group (<https://apwg.org/>).
- 21.87. There are close links between online safety concerns and child on child abuse. Whilst there are risks of online child on child abuse and access to potentially harmful content outside of school, pupils may still have access to mobile and smart devices in school and therefore staff must be alert to this risk and ensure pupils adhere to policy in respect of the use of mobile and smart devices on site.
- 21.88. Staff must ensure pupils understand both the risks and potential sanctions of non-compliance in respect of the use of mobile and smart devices, as part of the Online Safety Curriculum and in accordance with the Online Safety Policy (Including Acceptable Use of Technologies) and the Behaviour Policy.

- 21.89. Communications with parents and carers should be used to reinforce the importance of children being safe online. Our school uses filtering and monitoring technology to maintain safety on school devices. Parents and carers are to be made 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 (if anyone) their child is going to be interacting with online to support online safety in the home.
- 21.90. As part of the Annual Safeguarding Audit, the school will undertake an annual review of the approach to online safety, inclusive of an annual Risk Assessment which will be shared with the Local Education committee/local relevant committee.
- 21.91. Additional information regarding keeping children safe online (including when they are online at home) is provided in *Part 2 of Keeping Children Safe in Education 2023*.

### Radicalisation and the Prevent Duty

- 21.92. The school has a legal duty to have due regard to the need to prevent individuals from being drawn into terrorism.
- 21.93. The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The school is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 21.94. The school has adopted the Government's definitions from the *Prevent Duty Guidance: England and Wales 2023* and also from *Keeping Children Safe in Education 2023* for the purposes of compliance with the Prevent Duty 2023:
- 21.94.0. **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- 21.94.1. **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- 21.94.2. **Terrorism** is defined by the Terrorism Act 2000 (TACT 2000) as 'The use or threat of serious violence against a person or serious damage to property where that action is:
- 21.94.2.1. designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; and
- 21.94.2.2. for the purpose of advancing a political, religious, racial or ideological cause.'
- 21.94.3. **Susceptibility** is complex and unique to a person's circumstances. Within Prevent, susceptibility refers to the fact that a person may be likely or liable to be influenced or harmed by terrorist and extremist ideologies that support or radicalise people into terrorism. A person's susceptibility may be linked to their vulnerability, but not all people susceptible to radicalisation will be vulnerable. There may be other

- circumstances, needs or other underlying factors that may make a person susceptible to radicalisation but do not constitute a vulnerability.
- 21.95. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children and young people's behaviour which could indicate that they may be in need of help or protection.
- 21.96. Children and young people susceptible to radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be susceptible to radicalisation and act proportionately.
- 21.97. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a Prevent referral.
- 21.98. *Channel Duty Guidance: Protecting People Susceptible to Radicalisation 2023* notes the following:
- 21.98.1. There is no single pathway to being radicalised. There are many factors which can, either alone or combined, lead someone to subscribe to extremist ideology, and thereafter be drawn into or become an advocate of terrorism. These factors often include exposure to radicalising influences, real and perceived grievances (often created or exacerbated through grievance narratives espoused by extremists), and a person's own susceptibility.
- 21.99. The school will be sensitive to age and learning appropriate behaviour, though example indicators that an individual is engaged with an extremist group, cause or ideology include:
- 21.99.1. Spending increasing time in the company of other suspected extremists;
- 21.99.2. Changing their style of dress or personal appearance to accord with the group;
- 21.99.3. Day-to-day behaviour becoming increasingly centered around an extremist ideology, group or cause;
- 21.99.4. Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- 21.99.5. Possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- 21.99.6. Attempts to recruit others to the group/cause/ideology;
- 21.99.7. Communications with others that suggest identification with a group/cause/ideology.
- 21.100. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:
- 21.100.1. Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- 21.100.2. Using insulting or derogatory names or labels for another group;
- 21.100.3. Speaking about the imminence of harm from the other group and the importance of action now;

- 21.100.4. Expressing attitudes that justify offending on behalf of the group, cause or ideology;
  - 21.100.5. Condoning or supporting violence or harm towards others; or
  - 21.100.6. Plotting or conspiring with others.
- 21.101. Protecting children from radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms at school, home, and in the community.

## 22. Appendix 3 – Procedures for Staff Responding to Possible Abuse

### Guidance for staff and volunteers on suspecting or hearing a disclosure of abuse / Responding to a cause for concern

**Action staff must take** - A member of staff, agency/supply staff or volunteer suspecting or hearing a disclosure of abuse (including child on child abuse and Online safety concerns):

- 22.1. Must listen carefully to the child or young person and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
- 22.2. Must not ask leading questions, i.e. a question which suggests its own answer;
- 22.3. Must reassure the child or young person but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken;
- 22.4. **Staff are not to view or forward illegal images of a child.**
- 22.5. **Staff must keep a sufficient written record of the conversation or concern within CPOMS.** This record should be made within 24 hours. The record should include:
  - 22.5.0. the date and time;
  - 22.5.1. the location that the conversation or concern took place;
  - 22.5.2. a clear and comprehensive summary of the concern including the child's voice where possible;
  - 22.5.3. details of how the concern was followed up and resolved;
  - 22.5.4. a note of any actions taken, decisions reached and the outcome.
  - 22.5.5. The CPOMS record must clearly outline those involved using full names for pupils and full names and roles of professionals and family members.
  - 22.5.6. The CPOMS record should be factual and not contain the opinion of the staff member.
  - 22.5.7. The CPOMS record should not contain information relating to staff investigations or suspensions beyond the initial concern relating to the child.
- 22.6. Where a concern is significant, such as regarding injury to pupils or staff, serious incidents, and any external referral, contact should be made directly with appropriate staff such as the Designated Safeguarding Lead, Principal, and central staff such as the NAS Safeguarding Advisor for Children and

- Young People. Recording a concern on CPOMS is not a substitute for this reporting process.
- 22.7. **If there is an immediate Child Protection matter, staff must inform the Designated Safeguarding Lead (or deputy) verbally, as soon as possible and follow up with a CPOMS log.**
- 22.8. If any other forms of evidence are gathered by any other means, for example, scribbled notes, mobile phones containing text messages, clothing or via school computers, these must be safeguarded and preserved and passed directly to the Designated Safeguarding Lead without delay.
- 22.9. All suspicions or disclosures of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in [Appendix 3](#) should be followed.
- 22.10. If there is a risk of immediate serious harm to a child or young person a referral should be made to children's social care immediately and Police where required.
- 22.11. Anybody can make a referral. If the child or young person's situation does not appear to be improving, the staff member with concerns should press for re-consideration.
- 22.12. Weekly 7-day report monitoring will be undertaken to review all entries and follow up actions into CPOMS, conducted by the Principal and DSL.

### Action by the Designated Safeguarding Lead

- 22.13. On being notified of a concern, disclosure or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will consider:
- 22.14. The local inter-agency procedures of the Local Safeguarding partnership;
- 22.15. Responsibilities outlined in *Keeping Children Safe in Education 2023*;
- 22.16. Where relevant, local information sharing protocols relating to Channel referrals;
- 22.17. The nature and seriousness of the concern or disclosure. Information regarding a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist activity, will always be referred to local authority children's social care services and the Police;
- 22.18. The child's wishes and feelings; and
- 22.19. Duties of confidentiality, so far as applicable.
- 22.20. If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult with the **Safeguarding Advisor for Children and Young People**.
- 22.21. As soon as sufficient concern exists that a child may be at risk of significant harm, a referral to the local authority children's social care services will be made without delay (and in any event within 24 hours).
- 22.22. If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to the local authority children's social care services within 24 hours. Paragraph 71 of *Working Together to Safeguard Children 2018* states that: "Within one working day of a referral being received, a local authority social worker should acknowledge receipt to the referrer and make a decision about next steps and the type of response



- required.” If no response or acknowledgment is received within this timeframe, the Designated Safeguarding Lead will contact the local authority children's social care services again.
- 22.23. Whether or not the school decides to refer a particular concern to the local authority children's social care services or the Police, the parents and pupil will be informed of their right to make their own complaint or referral to local authority children's social care services or the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.
- 22.24. In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of Early Help or additional support from one or more agencies, the Designated Safeguarding Lead will liaise with the local Early Help team and /or children's social care and where appropriate an inter-agency assessment will take place, including use of the Early Help Assessment / Team Around the Child approaches, as necessary.
- 22.25. Where relevant, the school will co-operate with the Channel Panel, the Police and/or children's social care in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The school will respond to requests for information from the Police promptly and in any event within 48 hours.
- 22.26. In circumstances where it has been identified that it may be necessary to conduct a search of a pupil/pupil for a prohibited item (as outlined in the Behaviour Policy), parents/carers will be contacted prior to conducting the search. In circumstances where it may be necessary to contact the Police for support/guidance in relation to a search, parents/carers will again be notified and where necessary an appropriate adult will be nominated in support of this child – in accordance with guidance outlined in Annex c of *Keeping Children Safe in Education 2023* and [PACE Code C 2019](#).

### Action DSL must take in respect of Child on Child abuse

- 22.27. Reports of child on child abuse, particularly sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made. Any decisions are for the School to make on a case-by-case basis, with the Designated Safeguarding Lead (or a deputy) taking a leading role, using their professional judgement, and being supported by other agencies, such as children's social care and the Police as required.
- 22.28. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. Abuse that occurs online or outside of the School will be treated with equal seriousness.

- 22.29. If possible, managing reports with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a deputy). However, this might not always be possible; where the report includes an online element, being aware of [searching screening and confiscation advice \(for schools\)](#) and the [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).
- 22.30. The Designated Safeguarding Lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment.
- 22.31. **The DSL will hold an initial review meeting with appropriate staff.** This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns – at this point, Risk is to be assessed and referrals to Police and social care considered as necessary.
- 22.32. When there has been a report of sexual violence, the DSL (or deputy) will make an immediate risk assessment.
- 22.33. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.
- 22.34. Risk assessments should be recorded (written or electronic), uploaded to CPOMS and should be kept under review.
- 22.35. **The risk assessments** should consider:
- 22.35.0. the victim, especially their protection and support;
  - 22.35.1. whether there may have been other victims,
  - 22.35.2. the alleged perpetrator(s);
  - 22.35.3. all the other children (and, if appropriate, adult pupils and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
  - 22.35.4. consider intra familial harms and any necessary support for siblings following incidents
- 22.36. **The DSL and appropriate staff will hold subsequent interviews** with the children or young people involved (if appropriate)
- 22.37. **Parents and carers should be informed** at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm.
- 22.38. **A referral should be made to children's social care and/or the Police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm** at any point in the process.
- 22.39. **Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police.** Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the Police remains. The Police will take a welfare, rather than a criminal justice approach, in these cases.



- 22.40. Where there are images or videos of the abuse, **Staff are not to view or forward illegal images of a child.** It may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection.
- 22.41. The school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.
- 22.42. The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. Ultimately, the Designated Safeguarding Lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.
- 22.43. Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school will consider the need for anonymity and witness support see: [Safeguarding Children as Victims and Witnesses | The Crown Prosecution Service \(cps.gov.uk\)](#).
- 22.44. The DSL will ensure they do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.
- 22.45. The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities as part of the risk assessment process and will liaise with agencies accordingly should additional risks arise.
- 22.46. There are four likely scenarios for the school to consider when managing any reports of sexual violence and/or sexual harassment. Any combination of scenarios may need to occur. It will be important in all scenarios that decisions and actions are regularly reviewed and that where necessary relevant policies are updated to reflect lessons learnt. Likely scenarios:
- 22.46.0. Manage Internally
  - 22.46.1. Early Help
  - 22.46.2. Referral to Children's Social Care
  - 22.46.3. Reporting to the Police
- 22.47. For further guidance **see part 5 of Keeping Children Safe in Education 2023.**

## 23. Appendix 4 - Dealing with Allegations Against Staff, the Principal, Trustees or Volunteers

### The Schools' Procedures

The School's procedures for dealing with allegations made against staff will be used where the member of staff (including agency/supply staff), the Principal, a Trustee or volunteer has:

- 23.1. Behaved in a way that has harmed a child, or may have harmed a child or young person;

- 23.2. Possibly committed a criminal offence against or related to a child or young person;
- 23.3. Behaved towards a child / young person or children / young people in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children or young people.
- 23.4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 23.5. Any allegations not meeting these criteria (known as the 'Harms Threshold') will be dealt as a 'low level' concern in accordance with section two of *part 4 of Keeping Children Safe in Education 2023* and the Local Safeguarding partnership procedures. Advice from the local authority designated officer (LADO) will be sought in borderline cases.
- 23.6. All allegations must be dealt with as a priority so as to avoid any delay.
- 23.7. Allegations against a staff member who is no longer employed by the school and historical allegations will be referred to the LADO and where necessary the Police.
- 23.8. The school will report any allegations regarding external organisations using our premises to the LADO and Police as appropriate.

### Reporting an allegation against staff, the Principal, a Trustee or volunteer

- 23.9. **Where an allegation or complaint is made against any member of staff or volunteer who is not the Principal, the matter should be reported immediately to the Principal.**
- 23.10. **The Principal should notify the NAS Safeguarding Advisor for Children and Young People.** A discussion will then take place as to whether the concern meets the harm threshold to report to LADO or whether it will be treated as a low level concern.
- 23.11. The Principal may delegate to the Designated Safeguarding Lead (DSL), where appropriate, to investigate concerns.
- 23.12. Before contacting the local authority designated officer (LADO), the Principal, DSL, or an assigned case manager (referred to hereafter as the 'investigating officer') will conduct basic enquiries to help to determine whether there is any foundation to the allegation, being careful not to jeopardise any future Police investigation. The 'basic enquiries' should consider:
  - 23.12.1. Was the individual in the school/at the alleged location at the time stated within the allegation
  - 23.12.2. Did the individual or could the individual have come into contact with the child as alleged
  - 23.12.3. Are there any witnesses
  - 23.12.4. Was there any CCTV
- 23.13. The allegation and details of the basic enquiry will be discussed with the designated officer (LADO), within 24 hours of the allegation being raised.
- 23.14. Where appropriate, the Principal will consult and agree the next steps with the Designated Safeguarding Lead and/or an assigned investigating officer.

Following consultation, it will be decided if the case will be managed as either: An allegation that meets the harms threshold or an allegation/concern that does not meet harms threshold and will be investigated as a 'Low Level' concern.

- 23.15. **Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the NAS Safeguarding Advisor for Children and Young People**, without first notifying the Principal. Again, the allegation will be discussed immediately with the LADO before further action is taken.
- 23.16. **Where an allegation is made against any Trustee or local Education/relevant committee member, the matter should be reported immediately to the NAS Safeguarding Advisor for Children and Young People.**
- 23.17. All staff have access to SafeCall as an alternative method to raise a concern about a member of staff confidentially via phone: 0800 915 1571 or email: [nas@safecall.co.uk](mailto:nas@safecall.co.uk).
- 23.18. Any referral to LADO must be discussed with the **NAS Safeguarding Advisor for Children and Young People**.
- 23.19. Where suspension may need to be considered, advise should be sought from HR at the earliest opportunity with consideration of a possible risk assessment.

### Disclosure of Information

- 23.20. Where it has been alleged or identified that a child has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency, children's social care and Police should be contacted as appropriate and the DSL must be notified.
- 23.21. Two key aspects to consider when an allegation has been made:
  - 23.21.1. **Looking after the welfare of the child** – The DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described above.
  - 23.21.2. **Investigating and supporting the person subject to the allegation** – the Principal or investigating officer should discuss with the LADO, the nature, content and context of the allegation and agree a course of action.
- 23.22. When to inform the individual of the allegation should be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate local authority children's social care and the Police.
- 23.23. The parents or carers of the pupils involved will be informed of the allegation as soon as possible if they do not already know of it. Key parties will be kept informed of the progress and outcome of the case, however, information provided to those parties will be dependent upon and subject to the laws and guidance on confidentiality, data protection and the advice of external agencies.
- 23.24. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.
- 23.25. Where the investigating officer is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It

may be necessary for the DSL to make a referral to children's social care regarding the safety of these children.

- 23.26. Where it is clear that an investigation by the Police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should advise of the next steps with the investigating officer.
- 23.27. Where the initial discussion with the LADO leads to no further action, the investigating officer and the LADO should:
- 23.27.1. Record the decision and justification for it;
  - 23.27.2. Agree on what information should be put in writing to the individual concerned and by whom.

### Further Action to be Taken by the School

- 23.28. A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The school will act in accordance with *part 4 of 'Keeping Children Safe in Education' 2023* and the school's employment procedures.
- 23.28.1. Whilst schools are not the employers of supply teachers/staff, they should ensure all allegations are dealt with properly. The school will work alongside supply agencies and the LADO to ensure all allegations and concerns in respect of supply teachers/staff are fully investigated.
  - 23.28.2. See [relevant policy] for further information regarding the investigation process, next steps and potential disciplinary actions.

### Management of Low-Level Concerns

- 23.29. As part of the whole school approach to safeguarding, the school will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including agency/supply, volunteers and contractors) are dealt with promptly and appropriately.
- 23.30. The term low level concern does not mean that it is insignificant, it means the behaviour towards a child does not meet the harms threshold. However, the concern may indicate that the adult/staff member (including agency/supply, volunteer or contractors) may have acted in a way that:
- 23.30.1. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work,
  - 23.30.2. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 23.31. Low level concerns should be reported to the Principal. The Principal may delegate to the DSL, where appropriate, to investigate low level concerns. Where a low-level concern is raised about the Principal, it should be raised with the NAS Safeguarding Advisor for Children and Young People.
- 23.32. **Staff are not expected to determine for themselves whether a concern is low level or not. Any concern must be reported to the Principal who will make this assessment in collaboration with other internal and external professionals and in full knowledge of any previous concerns.**
- 23.33. The Principal will confidentially record all low level concerns, the context in which they arose and action taken. The Principal will record the name of the

individual who raised the low-level concern unless they wish to remain anonymous then that should be respected as far as reasonably possible.

- 23.34. The Principal should collect as much information as possible by:
- 23.34.1. speaking directly with the person who raised the concern;
  - 23.34.2. to the individual involved and any witnesses;
  - 23.34.3. review any documentation or additional information as necessary.
- 23.35. Low level concern records should be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. This may then need raising with LADO, should further concerns arise.
- 23.36. For further guidance regarding Low Level concerns, please speak with **HR and the NAS Safeguarding Advisor for Children and Young People**.

### Ceasing to Use Staff

- 23.37. If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children or young people, a settlement/compromise agreement **will not be used** and there will be a prompt and detailed report to the Designated officer (LADO), Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA). Any such incidents will be followed by a review of the safeguarding procedures within the school.
- 23.38. If a member of staff (or volunteer) tenders their resignation, or ceases to provide their services, any allegations will still be followed up by the school in accordance with this policy and a prompt and detailed report will be made to the local authority designated officer (LADO) and where necessary to the Disclosure and Barring Service and TRA.
- 23.39. Where a teacher has been dismissed, or would have been dismissed had they not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) is required.

### Unsubstantiated, False, or Malicious Allegations

- 23.40. Where an allegation is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's policies.
- 23.41. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the school reserves the right to contact the Police to determine whether any action might be appropriate.

### Record Keeping

- 23.42. Details of allegations found to be malicious will be removed from personnel records.
- 23.43. For all other allegations, full details will be recorded on the confidential personnel file of the person accused.
- 23.44. An allegation proven to be unsubstantiated, unfounded or malicious will not be referred to in employer references. In accordance with *part 4, 'Keeping*

*Children Safe in Education 2023'*, history of repeated concerns or allegations which have all been found to be false, unsubstantiated, or malicious will also not be included in any reference.

- 23.45. The school will retain all safeguarding records and relevant personnel records for so long as reasonably required<sup>5</sup>. The school will ensure that all records are created, retained, shared and destroyed in accordance with the Data Protection Act 2018. Further details can be found in the Data Protection policy and procedure.

## 24. Appendix 5 - Missing Pupil Procedures

### If a Child Goes Missing on School Premises

- 24.1. The member of staff who has noticed the missing child will inform the Principal and Designated Safeguarding Lead immediately.
- 24.2. The office staff need to be informed in order for a member of staff to be designated as a point of contact for receiving information about the search for the missing pupil.
- 24.3. Whilst a member of staff stays with the rest of the class, all other available members of staff will conduct a thorough search of the school premises as directed by the Principal/DSL.
- 24.4. All areas within the school premises will systematically be searched.
- 24.5. Available staff will begin a search of the area immediately outside of the school premises taking a mobile phone so that they can contact the school office.
- 24.6. **If the pupil has not been found after 10 minutes, then parents/carers should be notified.**
- 24.7. If the parents/carers have had no contact from the child, the Police will be contacted by dialling 999. Any medical, communication, learning needs or particular vulnerabilities must be disclosed to Police or other agencies.
- 24.8. The incident should be relayed to other important agencies: If the pupil has an allocated Social Worker, then they should be informed of the disappearance. If the pupil is a Child in Care/'Looked After Child' then the allocated Social Worker should be kept informed.
- 24.9. The **NAS Safeguarding Advisor for Children and Young People** must be informed once key agencies have been informed.

### If a Pupil Goes Missing on a School Trip

- 24.10. The trip leader must ensure the safety of the remaining pupils.
- 24.11. The trip leader/organiser, in discussion with other teaching staff will be responsible for making decisions relating to the trip.
- 24.12. One or more adults should immediately start searching for the missing pupil.
- 24.13. Regular head counting of pupils should take place, particularly before leaving a venue. Pupils should be readily identifiable, usually by wearing their uniform.
- 24.14. The school must be informed if a pupil is missing and cannot be found.



- 24.15. If the pupil has not been found within 10 minutes, the Police must be called by dialling 999. Any medical, communication, learning needs or particular vulnerabilities must be disclosed to Police or other agencies.
- 24.16. **Parents/carers should be notified.**
- 24.17. The incident should be relayed to other important agencies: If the pupil has an allocated Social Worker, then they should be informed of the disappearance. If the pupil is a Looked After Child, then the Social Worker should be kept informed.

### Actions After a Missing Incident

- 24.18. When the child is found, members of staff will care for and talk with the child, bearing in mind that they may be unaware of having done anything wrong or, alternatively, may also have been afraid and distressed and may now need comfort.
- 24.19. If hospitalisation is required, a suitably experienced (i.e. not on Probation) member of staff must go in the ambulance.
- 24.20. Once the child has been safely located, the child's parents/carers, relevant professionals, and the NAS Safeguarding Advisor for Children and Young People should be informed as promptly as possible.
- 24.21. After any incident of a missing child, a full incident report must be made on CPOMS, giving full details of how and when the incident occurred.
- 24.22. After the incident, the Principal and DSL will carry out a full investigation taking statements from all the staff present at the time.
- 24.23. The NAS Safeguarding Advisor for Children and Young People will offer a 'Post-Incident reflection' with involved staff including the Principal and DSL. A conclusion is drawn as to how the incident happened and used to inform future Risk Assessments.
- 24.24. A written report will be produced and policies and procedures will be reviewed.

## 25. Appendix 6 – Children Missing or Absent from Education Procedure

### Child Missing or Absent from Education Key Steps

- 25.1. School to attempt to make contact with parent/carer on Day 1 of absence – if child has a social worker, social worker informed of absence.
- 25.2. No later than Day 3 of absence, if no reason for absence has been obtained then home visit to be conducted by school staff to establish pupil's whereabouts.
- 25.3. Days 0-10, staff to continue to make efforts to engage the family and locate the pupil: taking record all contact/attempts including telephone calls, texts, emails, letters, home-visits and liaison with professionals who may be involved. School should consider what action is to be taken if it appears likely that the pupil will become a persistent absentee (10% or more of absence). Follow



local authority guidance regarding FPN code of conduct and child missing from education guidance.

### Whereabouts from Day 3 Remains Unknown

- 25.4. Evidence attempts to make contact / locate child /contact with family and consider referral for Police safe and well check.
- 25.5. Contact **NAS Safeguarding Advisor for Children and Young People** to alert them to this concern.
- 25.6. Consider referral to social care or Early Help if whereabouts still not established and no contact made.
- 25.7. Referral to local authority child missing from education team no later than day 10 when there is no explanation for absence and above checks have been completed. Detail clearly any safeguarding concerns you may have.
  - 25.7.1. DO NOT remove from your roll until child missing from education team has completed initial checks and confirmed that they can be removed.

### Whereabouts confirmed to be known but the child remains absent from school

- 25.8. Initiate Attendance protocol and consider if the Child meets the threshold for Early Help or Social Care involvement. Make a referral evidencing the actions you have taken.
- 25.9. Absence meets the threshold for enforcement action as outlined in the Kent Code of Conduct, Child stays on roll.