

**THE CITY OF ROCHESTER SCHOOL  
SAFEGUARDING CHILDREN - CHILD PROTECTION POLICY**

*This policy which applies to the whole school is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.*

**Safeguarding is the golden thread that runs throughout every aspect of the school. All our school policies support this policy.**

Safeguarding is everyone's responsibility. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. All employees and volunteers are required to sign that they read, understood and will abide with our Child Protection Policy, 'KCSIE Part 1 inclusive of Annex A' along with our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour Policy (Staff Code of Conduct), The Teachers' Standards, Learning Support Standards and HLTA Standards. This policy takes full account of the child protection procedures agreed by the [Medway Safeguarding Children Partnership](#), alongside the [Kent Safeguarding Children Partnership](#), as a number of our pupils come from this local authority.

We will always act in the best interests of the child. The City of Rochester School recognises it is an agent of referral and not of investigation. Any person may make a referral (including whistleblowing) to external agencies such as the *Local Authority Designated Officer (LADO) and the police, if necessary*. The City of Rochester School also allows access for children's social care from the host local authority and, from the local authorities where the children reside in undertaking their safeguarding (Child Protections) duties.

**Monitoring and review:** This policy is subject to continuous monitoring, refinement and audit by Alicja Emmett (Headteacher) who is the Deputy Designated Safeguarding Lead (DDSL), Lisa Crompton (Deputy Head), Kelly Lovell (Assistant Head) who is the Designated Safeguarding Lead and Alison Barton (School Wellbeing) who is also a Deputy DSL. The Trustees will undertake a full annual review of this policy and its procedures, inclusive of the implementation and efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. The Trustees recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. As such, staff have the opportunity to contribute to and shape our safeguarding arrangements and child protection policy. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed policy and it is made available to them in either a hard copy or electronically on the *staff share drive*.

Signed:

Date Reviewed: September 2023

Date of Next Review: September 2024

Version No. 9.2



Alicja Emmett  
Headteacher



Kirstine Boon  
Chair of Trustees and Safeguarding Trustee

This policy was last reviewed and agreed by the Board of Trustees at the school in September 2023 and will next be reviewed no later than September 2024 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Our school has a board of trustees who are the proprietor. The trustees have ensured that a member of the senior Leadership Team, appointed as designated safeguarding lead (DSL), is able to discharge that role with sufficient independence.

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## What to do if you have a welfare concern in City of Rochester School

### Why are you concerned?

- For example
  - Allegation/ child shares a concern or worry
  - Indicators of abuse or neglect
  - Mental health concerns

### Immediately record your concerns

- Follow the schools procedure recording on CPOMS
- Reassure the child
- Clarify concerns if necessary (**TED**: Tell, Explain, Describe)
- Use child's own words
- Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead Kelly Lovell 01634 570706

[kelly.lovell@cityofrochesterschool.org](mailto:kelly.lovell@cityofrochesterschool.org)

### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the MSCP [Inter-Agency Threshold Criteria for Children in Need](#) for further guidance.
- If the child is **at imminent risk of harm** a referral will be made to First Response – 01634 334466
- If the child is **NOT** at imminent risk, then a referral will be made via [\(the portal\)](#)
- If unsure then consult with First Response 'No Name Consultation line' 9:30 – 12:30 (01634 33 1662) or First Response on 01634 33 4466

### If you are unhappy with the response

#### Staff:

- Follow local escalation procedures
- Follow Whistleblowing procedures

#### Pupils and Parents:

- Follow school complaints procedures

Record decision making and action taken in the pupil's Child Protection/safeguarding file

### Monitor - Be clear about:

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

Review and request further support (if necessary)

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

## 1. Introduction and Ethos

- City of Rochester School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, trustees, leaders, parents, families, and pupils) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- City of Rochester School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include girls, pupils who identify as Lesbian, Gay, Bisexual, Transgender Queer+ (LGBTQ+), or are perceived by peers to be LGBTQ+, and pupils with SEND. We recognise that these children can be targeted by other children and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Pupils are protected from upskirting, bullying (+ cyber), homophobic, biphobic and transphobic behaviour, racism, sexism, and all other forms of discrimination.
- Our school acknowledges the need to treat everyone with equity, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.
- Through their day-to-day contact with pupils and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse, neglect, or mental health concerns at an early stage. Our school may be the only secure, stable, and predictable element in their lives.
- City of Rochester School will endeavour to support the welfare and safety of all pupils through:
  - Ensuring that the child's welfare is of paramount importance.
  - All staff are trained and can recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
  - Ensuring that children's mental and physical health or development is not impaired.
  - Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) to help pupils stay safe, recognise when they don't feel safe and identify who they might / can talk to.
  - Work with parents/carers to ensure that they understand the school's legal responsibility to safeguard and ensure the welfare of all children including the need for referral to other agencies in some situations.
  - Keeping confidential records which are stored securely and shared appropriately with other professionals.
  - Ensuring the voice of the child is evident in individual case files and informs the school's policy developments.
  - Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors and contractors, and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all our children at our school.
- City of Rochester School expects that if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

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- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including and trustees, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2023.

## 2. Policy Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
  - DfE Keeping Children Safe in Education 2023 (KCSIE)
  - Working Together to Safeguard Children 2018 (WTSC)
  - Ofsted: Education Inspection Framework' 2019
  - Framework for the Assessment of Children in Need and their Families 2000)
  - Kent and Medway Safeguarding Children Procedures (Online)
  - Early Years and Foundation Stage Framework 2021 (EYFS)
  - The Education Act 2002
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - City of Rochester School online safety Policy
  - City of Rochester School Retention policy
- [Section 175 of the Education Act 2002](#) requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- City of Rochester School put measures in place to fully safeguard children in response to coronavirus (Covid-19), in accordance with KCSIE 2021 and related government guidance. We will continue to follow government guidance and continue to review safeguarding procedures and amend this policy to support the response to the pandemic if necessary.

## 3. Definition of Safeguarding

- Safeguarding children is defined in Keeping Children Safe in Education 2023 as:
  - protecting children from maltreatment
  - preventing impairment of children's mental and physical health or development
  - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes (Children includes everyone under the age of 18)
- City of Rochester School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Children with family members in prison
  - Children Missing Education (CME)
  - Children absent from Education (CAE)
  - Child missing from home or care

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- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Child on child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

(Also see Annex B within ‘Keeping children Safe in Education’ 2023 p.139)

#### **4. Policy Compliance, Monitoring and Review**

- City of Rochester School will review this policy at least annually. The policy will be revised following any national or local policy updates, any significant national events, local child protection concerns and/or any changes to our procedures.
- The trustees have strategic leadership responsibility for City of Rochester School safeguarding arrangements and must ensure that School name complies with their duties under legislation. The trustees must ensure policies, procedures and training in their schools or colleges are effective and comply with the law at all times
- The Designated Safeguarding Leads / Headteacher will ensure regular reporting on safeguarding activity and systems in school to the trustees. The trustees will not receive details of individual student situations or identifying features of families as part of their oversight.
- This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

#### **5. Key Responsibilities**

##### **5.1 Trustees**

- The Trustees will read the full Keeping Children Safe in Education guidance (2023). The Trustees and Leadership Team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

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- City of Rochester School has a nominated Trustee for safeguarding, Kirstine Boon (who is also the Chair of Trustees), will take the lead role in ensuring that the school has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- Trustees will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- The Trustees will regularly review the effectiveness of school filtering and monitoring systems. They will ensure that the Leadership Team and relevant staff are:
  - aware of and understand the systems in place
  - manage them effectively
  - know how to escalate concerns when identified.
- The Trustees, Headteacher and Leadership Team will ensure that the DSL is suitably supported in their role and has the appropriate status, authority, funding, resources, and training and is assured that the DSL understands they have the responsibility in leading safeguarding and child protection across the school.
- The Safeguarding Trustee will also carry out regular safeguarding monitoring in conjunction with the DSL. (See monitoring calendar for frequency)

## 5.2 Designated Safeguarding Lead (DSL)

- The Designated Safeguarding lead will carry out their roles in accordance with Keeping Children Safe in Education 2023.
- The school has appointed **Kelly Lovell, Assistant Headteacher** as the Designated Safeguarding Lead (DSL) they are a member of the senior Leadership Team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school.
- The City of Rochester School has appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The Designated Safeguarding Lead and any deputies will undergo appropriate training to provide them with the knowledge and skills required to carry out their role.
- The headteacher will be kept informed of any significant issues by the DSL.
- The DSL and any deputy DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods (e-bulletins, conferences, local meetings, other training etc.) at regular intervals and at least annually, to keep up with any developments relevant to their role.
- Availability - during term time the DSL (or a DDSL) will always be available (during school hours) for school staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements will be made for any out of hours/out of term activities.

During school holidays, the DSL will provide appropriate emergency contact details to the MASH Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.

### **Designated Safeguarding Lead (DSL) and Prevent Officer for the whole school**

Kelly Lovell who is the Assistant Head – Pastoral and Welfare

Telephone number: 01634 570706 and 07947 144640 (Out of school hours:)

Email address: [kelly.lovell@cityofrochesterschool.org](mailto:kelly.lovell@cityofrochesterschool.org)



### **Deputy Designated Safeguarding Lead (DSL) and Deputy Prevent Officer for the whole school**

Alicja Emmett who is the Headteacher

Telephone number: 01634 570706

Email address: [alicja.emmett@cityofrochesterschool.org](mailto:alicja.emmett@cityofrochesterschool.org)



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

Alison Barton who is Pupil Well Being and Behaviour Support Co-Ordinator

Telephone number: 01634 570706

Email address: [alison.barton@cityofrochesterschool.org](mailto:alison.barton@cityofrochesterschool.org)



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

Kaylee Ben-Hania who is Family and Child Support Worker

Telephone Number 01634 570706

Email address: [Kaylee.Ben-Hania@cityofrochesterschool.org](mailto:Kaylee.Ben-Hania@cityofrochesterschool.org)



### **Nominated Trustee for Safeguarding and the Prevent Duty**

In our school the Trustee for Child Protection is Kirstine Boon (Chair of Trustees)

Telephone number: 01634 570706

Email address: [kirstine.boon@cityofrochesterschool.org](mailto:kirstine.boon@cityofrochesterschool.org)



- **It is the role of the DSL to:**

- Act as main contact point for all school staff to discuss any safeguarding concerned.
- Manage and maintain the confidential paper/electronic case management systems to record cause for concerns on pupils to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
- Coordinate safeguarding action for individual children in the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
- Liaise with the headteacher or principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)
- To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2023 and WTSC 2018.
- Ensure that Medway/Kent referral procedures are followed as necessary (see referral process page 2).
- As required represent and liaise appropriately with other professionals and ensure the school is represented at multi agency safeguarding meetings (including child protection conferences).
- Act as a source of support, advice and expertise for all staff during term time for staff in the school to be able to discuss any safeguarding concerns.
- Understand the importance of information sharing both within the school and with other schools and agencies.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.

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- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2023

For further details and information about the DSL role please refer to KCSIE 2023 Annex C p.164

### 5.3 Members of Staff

- **All members of staff have a responsibility to:**
  - Provide a safe environment in which children can learn and promote the child's welfare
  - Maintain an attitude of **'it could happen here'** where safeguarding is concerned and to always act in the best interests of the child
  - Understand the early help process and their role in it.
  - Be aware of the indicators of abuse and neglect so that they can identify cases of children who may be in need of help or protection.
  - Understand that children may not feel ready to, or know how to, tell someone they are being abused, exploited or neglected and/or that they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. They may feel embarrassed, humiliated or be being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns any about a child.
  - Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
  - Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
  - Know how to maintain an appropriate level of confidentiality.
  - Understand and comply with this policy and understand other safeguarding policies and systems.
  - To undertake regular and appropriate training which is regularly updated.
  - Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the school safeguarding regime. (This may include accessing the school whistleblowing policy)

### 5.4 Children and Young People

- **Children and young people (pupils) have a right to:**
  - Contribute to the development of school safeguarding policies.
  - Report abuse confidently knowing concerns will be taken seriously and that they will be listened to and effective action will be taken.
  - Seek help from a trusted adult and feel listened to.
  - Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

### 5.5 Parents and Carers

- **Parents/carers have a responsibility to:**
  - Work in partnership with the school to safeguard and promote the welfare of child/ren and understand City of Rochester School statutory responsibilities in this area.
  - Read and adhere to the relevant school/policies and procedures.
  - Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.

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- Identify behaviours which could indicate that their child is at risk of harm including online
- Seek help and support from the school, or other appropriate agencies.
- We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to safeguard a child/ren.

**The welfare and safety of children however are the responsibility of all staff in school and ANY concern for a student's welfare MUST be reported to the Designated Safeguarding Lead.**

## **6 Recognising Indicators of Abuse and Neglect**

- As a school we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another for further guidance: [Responding to Abuse and Neglect](#). This is outlined locally with the Medway/Kent Threshold Guidance
- Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).
- All staff in school should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
  - **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.
  - **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.
  - **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.
  - **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.

**The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to [What to do if you are worried a child is being abused 2015](#).**

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviours for a younger child might be normal for an older child.
- City of Rochester School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- 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. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

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- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## **7 Specific Safeguarding Issues**

- City of Rochester School is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- City of Rochester School staff are mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).
- 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 sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list but gives an indication of the current themes in safeguarding and protecting children.

### **7.1 Child on child Abuse**

- City of Rochester School recognises that children are capable of abusing their peers This referred to as child-on-child abuse and can take many forms.
- City of Rochester School believes that abuse is abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- City of Rochester School recognises that child on child abuse can take many forms, including but not limited to:
  - bullying, including cyberbullying
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment
  - 'upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - nude or semi-nude image sharing (also known as 'sexting' or youth produced/involved sexual imagery)
  - initiation/hazing type violence and rituals
- Staff and leadership recognise that that some Child -on-Child abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all Child-on-Child abuse is unacceptable and all reports will be taken seriously.
- In order to minimise the risk of Child on-Child abuse, City of Rochester School will:
  - implement a robust anti-bullying policy
  - provide an age/ability appropriate PSHE and RSE curriculum
  - provide a range of reporting mechanisms, emails, can be sent to staff, and to DSL/DDSL, access to the welfare team.

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- City of Rochester School will not tolerate, dismiss or minimize any harmful behaviours in school and will take swift action to intervene when this occurs. All allegations of Child-on-Child abuse will be recorded, investigated, and dealt with in line with associated school/college policies, including child protection, anti-bullying and behaviour.
- Alleged victims, perpetrators and any other child affected by Child-on-Child abuse may be supported by:
  - taking reports seriously
  - listening carefully
  - avoiding victim blaming
  - providing appropriate pastoral support
  - working with parents/carers
  - reviewing educational approaches
  - and in cases of sexual assault, informing the police and/or First Response.
- The school will take steps to ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of Child-on-Child abuse. We will also ensure that children recognise warning signs and supports of support both within the school and externally (such as Kent Police, ChildLine etc.).

## **7.2 Child on Child Sexual Violence or Harassment**

- City of Rochester School will follow the guidance outlined in part five of KCSIE 2023 which has now merged with the content of DfE guidance '[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)'. When responding to concerns relating to child-on-child sexual violence or harassment
  - If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.
- City of Rochester School recognises that staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes.
- It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them.
- Where possible KCSIE 2023 recommends that two members of staff manage reports of sexual violence and harassment.
- Reports will initially be managed internally by the City of Rochester School and where necessary will be referred to Integrated Children's Services and/or the Police.
- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or City of Rochester School staff; and, any other related issues or wider context.
- We will reassure and teach our pupils to understand that the law is in place to protect children and young people rather than criminalise them.
- City of Rochester School will regularly review decisions and actions to update and improve policies and practice.

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- The school will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours and may need signposting to further sources of support.

### 7.3 Nude and/or Semi-Nude Image Sharing by Children

- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated December 2020)
- The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.
- When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:
  - Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
  - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this will be immediately reported to the DSL.
  - Not delete the imagery or ask the young person to delete it.
  - Not say or do anything to blame or shame any children involved.
  - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
  - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- City of Rochester School recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or "sexting") is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
  - the DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.
  - parents and carers will be informed at an early stage and involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
  - a referral will be made to ICS and/or the police immediately if:
    - the incident involves an adult (over 18).
    - there is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, age of SEND).
    - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
    - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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#### **7.4 Gangs, County Lines, Serious Violence, Crime and Exploitation**

- City of Rochester School acknowledges the impact of gangs, county lines, serious violence, crime and exploitation. Any concerns regarding gangs, county lines, serious violence, crime and exploitation will be reported and responded to in line with other child protection concerns.
- The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.
- Criminal exploitation of young and vulnerable people is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace this is commonly referred to as cuckooing.
- All staff have been trained and recognise the need to be vigilant for the signs and aware of risk factors which may increase the likelihood of involvement in serious violence, exploitation, and gang activity including but not limited to:
  - Being male – however girls who are exploited can be very different to that of boys, indicators may not be the same, but professionals need to be aware that girls are just as much at risk as boys.
  - Children who associate with other young people involved in exploitation
  - Children who go missing for periods of time or regularly come home late
  - Change in friendships/relationships with others/groups
  - Having been frequently absent or permanently excluded from school
  - having experienced child maltreatment
  - Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
  - Signs of self-harm/significant change in wellbeing
  - having been involved in offending, such as theft or robbery
- Further advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance. County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council.
- City of Rochester School will make referrals to Children's Services and the police if we have reason to believe a student has become involved in these types of activity.

#### **7.5 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- City of Rochester School recognises both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator
- The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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- Sexual exploitation can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the [Exploitation Identification Tool](#) and the MSCP Risk [Assessment tool for sexually active young people](#).
- Through this portal you can report **Perpetrators** of child exploitation, **Places and Spaces** where Child Exploitation is suspected of taking place and **vehicles** believed to be connected to be exploiting children. Please use the link to - [Report an Exploitation Concern Online](#).

**This is for Child Exploitation specifically. But for general vulnerability concerns, they still need to be reported directly to the police in the usual way (101 or 999).**

**Please note, this portal is also not suitable for reporting crime as it is not monitored 24/7.**

- City of Rochester School will make referrals to Children's Social Care and the police if we have reason to believe a student has become involved in this activity.

## 7.6 Mental Health

- City of Rochester School will ensure that all staff have an awareness of mental health problems and be aware in some cases, that it can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are **'well placed'** to identify behaviour suggestive of a mental health problem or being at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following school policy, and speaking to the designated safeguarding lead or a deputy.
- City of Rochester School has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems – see Appendix 7.

## 7.7 Online Safety

- It is recognised by City of Rochester School that the use of technology presents challenges and risks to children and adults both inside and outside of City of Rochester School
- The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.
- City of Rochester School/College] will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.
- The DSL and Leadership Team and Trustees have read and understood, and acted upon all guidance regarding Online Safety within Keeping Children Safe in Education 2023.

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- City of Rochester School identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into four areas of risk:
  - **Content:** being exposed to illegal, inappropriate or harmful material
  - **Contact:** being subjected to harmful online interaction with other users
  - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
  - **Commerce** – being exposed to online gambling, inappropriate advertising, phishing and or financial scams.

City of Rochester School recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2023 and has appropriate policies in place that are shared and understood by all members of the school community. Further information reading the specific approaches relating to this can be found in the school's Online Safety Policy, Acceptable Use of ICT Policy and Personal Devices policy which can be found on the staff shared area.

- City of Rochester School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, intranet and email systems.
  - All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place
- All members of staff have access to appropriate, regular and up-to-date online safety information as part of their safeguarding training.
- City of Rochester school ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.
- City of Rochester School will ensure that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils and staff, including school devices used by pupils at home.
- City of Rochester School will ensure that when pupils and staff access the school systems and internet provision appropriate filters and monitoring systems are in place.
- Filtering and monitoring are an important part of school's online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
- City of Rochester School recognises that many pupils and parents will have unlimited and unrestricted access to the internet via 3G and 4G in particular this is external to the school's control such as mobile phones and other internet enabled devices. Where concerns are identified appropriate action will be taken. Kelly Lovell Designated Safeguarding Lead (Pupil Code of Conduct on Acceptable Use.)
- City of Rochester School will ensure a comprehensive whole school curriculum is developed and in place to enable and equip all pupils with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively. DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE '[Teaching online safety in school](#)' guidance.
- The school will also support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.
- The school will also support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online. We will share information with parents/carers about:
  - what systems are in place to filter and monitor online use
  - what children do online as a part of their learning, including the sites they may asked to access

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- who from the school or college (if anyone) their child is going to be interacting with online, as a part of remote learning?
- The DSL will respond to online safety concerns in line with the child protection and other associated policies such as anti-bullying and behaviour.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

#### **Where children are asked to learn online at home in response to a full or partial closure:**

- City of Rochester School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using City of Rochester School provided or approved communication channels; for example, City of Rochester School provided email accounts and phone numbers and/or agreed systems e.g. Teams
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our City of Rochester School behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Pupil Remote Learning Policy.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. City of Rochester School will continue to be clear who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

Additional guidance for DSLs and SLT regarding remote learning is available at DfE: [Safeguarding and Remote Education](#)

#### **7.8 Children Missing Education (CME) and Persistently Absent Children**

- All staff should be aware that children going missing, and who are absent from education, particularly on repeat occasions and /or prolonged periods this can be a vital sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- Where a child has an EHCP local authority will need to review the plan whilst working closely with parents.
- City of Rochester School recognises that, when a child is not in school, they may be susceptible to or exposed to other risks and so we work with parents and other partners to keep children in school whenever possible.
- Staff should be aware of their school's unauthorised absence and children missing from education procedures.

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## 7.9 Domestic Abuse

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long-lasting impact upon children and is a form of child abuse.
- City of Rochester School recognises that Domestic abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional abuse.
- In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

## 7.10 So-called 'honour-based' abuse

- So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed in the belief that they 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.
- All staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

## Female Genital Mutilation (FGM):

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, 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. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students.
- The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty [FGM Fact Sheet](#)
- 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 good reason not to, they should still consider and discuss any such case with the school's or college's Designated Safeguarding Lead (or deputy) and involve children's social care as appropriate.

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## Forced Marriage

- City of Rochester School recognise 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 **no** violence, threats or another form of coercion are used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see page 155 of KCSIE 23) ([Legal age increases to 18](#))
- City of Rochester School recognise that some communities use religion and culture as a way to coerce a person into marriage. Sometimes violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological.
- Multi-agency statutory guidance for dealing with forced marriage, which can found at [The right to choose: government guidance on forced marriage](#) - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).
- Staff at City of Rochester School will immediately refer, to the DSL, if they have reason to believe that a child may be at risk of being taken out of the country for the purposes of a forced marriage.

## Breast Ironing

- Breast flattening is a form of child abuse. See the CPS legal guidance on [Child Abuse](#)
- Breast Ironing is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down using hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education
- There are potentially significant physical and psychological consequences and risks related to this practice. Breast flattening is a form of child abuse. Therefore, professionals must follow their Local Safeguarding Children's Board Procedures.

## 7.11 Preventing radicalisation

- The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.
- Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.
- Every member of staff at City of Rochester School recognises that children exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting children from other risks.

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- All staff and trustees should complete the Prevent online Awareness training package developed by the Home Office which includes guidance on how to identify people who may be susceptible to being drawn into terrorism, and how to refer them into the Channel process.

### 7.12 Looked after children, previously looked after children and care leavers

- City of Rochester School acknowledges and understand the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child potentially remains vulnerable.
- The school has a DLAC, Alicja Emmett (Headteacher) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- City of Rochester School understands their responsibility to inform the Local Authority via First Response of Private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement. (When a child under 16, or a8 if they are disabled is cared for and lives with an adult who is not a relative for 28 days or more.)

## 8 Child Protection Procedures

- City of Rochester School adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>
- If staff have any concerns about a child's welfare, they should act on them immediately. See page 2 for a flow chart setting out the process for staff when they have concerns about a child.
- If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to **First Response 01634 334466** and/or the police. **If it is an emergency the police need to be called on 999.**
- If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.
- Less urgent concerns or requests for support will be referred to Children's social care and Early Help via the Medway online form ([the portal](#))
- Once staff have spoken to the DSL the options the DSL will take will then include:
  - managing any support for the child internally via the school's own pastoral support processes.
  - a Family Solutions referral or Early Help Assessment
  - Make a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.
  - All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wherever possible the school will share safeguarding concerns, or the intention to refer a child to Children's social care, with parents or carers. **However, staff will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation.** On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.
- If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the consultation from the **'No Name' consultation line in First Response**

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**(9:30-12:30) on 01634 331662.** If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.

- Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation process.
- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following [MSCP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.
- All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to the First Response if the situation does not appear to be improving or is getting worse.
- City of Rochester School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation Encompass is and there is a clear process for managing notifications in school (including cover if a named individual is absent).
- The child's wishes
  - Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best** interests of the child at their heart. **However, this should not prevent safeguarding action being taken, for the child or children involved.**

## 9 Record Keeping

- Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on CPOMS. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy).

### Child Protection Management System (CPOMS)

**What is CPOMS?** CPOMS is a software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside our existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much more. Every member of staff across school has an obligation to report any concerns which they may have. CPOMS allows them to record information in a central repository and have relevant people alerted immediately. Senior leaders are able to build a chronology around a pupil and can produce reports on vulnerable pupil groups for Case Conference Meetings, Trustees and Ofsted at the touch of a button.

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**Builds A Chronology:** CPOMS allows us to quickly, easily and above all else securely record all of the information we have on a child in one place. The chronology around a pupil is built automatically and trends are much easier to spot than they would be on bits of paper. Our staff from across school can add information to CPOMS allowing Senior Leadership Team (SLT) to take appropriate follow up action thereafter. CPOMS can be accessed from anywhere that has an internet connection and will display neatly across all devices (including tablets and smartphones). Reporting within CPOMS allows us to analyse our data. We decide what categories of information we would like to monitor.

CPOMS will enable us to improve our management of child protection and similar incidents and actions, whilst reducing staff time, paperwork and administration. It will also track referrals to external agencies, such as the NHS/CAMHS, Children's Services, and the Police (including letters and phone calls) and inform us if timescales are not being met. CPOMS also uses the same action-based functionality to track communication with parents and carers, as well as pupils themselves. A meeting held, conversation with a child, or a decision to undertake a CAF, can all be recorded on the system, in a safe, secure and searchable record.

Within our School, any safeguarding concern or serious behaviour incident will be logged, with the relevant staff members notified. In some cases, actions are then required from staff to follow up on concerns or next steps from Early Help or other children services. Staff have welcomed the anytime - anywhere approach to recording of safeguarding and the ability to alert staff who may not be on site at the click of a button is very helpful in speeding up the safeguarding process, with information being date and time stamped within a chronological filing system. CPOMS can:

- upload documents such as risk assessments.
  - assign cases to colleagues and hold them to account.
  - track level of teacher use and hold them to account for not using the system.
  - share information with colleagues.
  - share CP files with other CPOMS schools.
  - print CP files with other agencies.
  - record physical injuries issues and
  - generate reports and data about a variety of issues and categories.
- Staff will record any welfare concern that they have about a child on the school's safeguarding system, CPOMS and alert them without delay to the DSL.
  - Child Protection records will record facts and not personal opinions. If a staff member records an opinion, this should be made explicit in the recording.
  - A body map will be completed if injuries have been observed.
  - Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
  - Photographs of injuries should **NOT** be taken by staff; staff should use body maps to detail concerns. Taking photos of injuries can be traumatic and distressing for children and staff. Staff should not examine a child and should only record what they can see.
  - If photos of injuries are required for evidence purposes, this should be directed/carried out by the Police. If you are asked to take photos of an injury by a social worker or police officer clearly state in the records who asked you to do this, name, date, time, and ensure you record the individual's rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a social worker/ Police officer to attend.

- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

## **10 Child protection files**

- Where children leave the school or college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to City of Rochester School within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be done separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and to have that support in place for when the child arrives.
- If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person, to ensure there is effective transition and handover of information.
- Child protection files will always be kept by City of Rochester School. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they do they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.
- Pupils who leave City of Rochester School at 18 or leave during their primary or secondary education without an onward UK placement will have their files kept in line with our data retention schedule.

## **11 Multi-agency Working**

- City of Rochester School identifies that they have a pivotal role to play in multi-agency safeguarding arrangements. The Trustees ensure that City of Rochester School contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018.
- City of Rochester School recognises and is committed to its responsibility to work within the MSCP multi-agency safeguarding arrangements. The Leadership Team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- City of Rochester School will endeavor to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.
- City of Rochester School recognises the importance of multi-agency working and will provide requested reports and support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

## 12 Confidentiality and Information Sharing

- City of Rochester School expect all staff to treat information they receive about a children and young people in a discreet and confidential manner. Confidential information should never be used casually in conversation or shared with any person other than a **'need to know basis'**.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies. City of Rochester School recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2023.
- The Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection, yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. DfE "Information sharing advice for safeguarding practitioners" (2018) provides further detail
- City of Rochester School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school/college is compliant with all matters relating to confidentiality and information sharing requirements. Kieran Yates is City of Rochester School's DPO.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

## 13 Complaints

- City of Rochester School has a complaints procedure which can be found on the school website. As a school we encourage children and families to raise with us complaints, concerns or comments and have a robust internal investigation process.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Safeguarding concerns should be raised with school immediately. If a concern or a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the police on 101. All visitors are given a safeguarding leaflet that outlines how to share concerns and code of conduct expected by visitors/contractors.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 19 of this policy.

## 14 Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of "*Keeping Children Safe in Education*" (2023) and Annex B which covers Safeguarding information for all staff.
- School Leaders and Trustees including the DSL will have a thorough awareness of the entirety of KCSIE.
- All Members of staff sign to confirm that they have read and understood Part One and Annex B (or Annex A if deemed appropriate) of KCSIE. The policy is posted onto CPOMS and staff sign to say they have read the relevant sections. A record of this is held on the system.

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- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the City of Rochester School internal safeguarding processes as part of their induction. This is done through dedicated training on Mentor online and in school training annually.
- All staff should undergo safeguarding and child protection training (including online safety and cyber training) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners. This training will include online safety and will take place at least annually.
- In addition to child protection training all members of staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary/supply staff) will be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable ICT Use Policy.
- Governing bodies and proprietors should recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- The DSL and Head Teacher will provide an annual report to the Trustees detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained. This is listed in the schools Headteacher Report.
- City of Rochester School has a nominated lead for the Trustees, Kirstine Boon, who ensures that all members of the Trustee board will access appropriate safeguarding training which covers their specific strategic responsibilities at induction and on a regular basis. Training will provide them with the knowledge to ensure their school's safeguarding policies and procedures are effective. This includes trustees' strategic responsibility for online safety and Cyber training annually.
- Three times a year staff will have training based on lessons learnt from case reviews in school, and nationally to ensure that we are reflecting and ensure best practice for our pupils.

## **15 Safe Working Practice**

- All members of staff are required to work within clear guidelines on Safe Working Practice / the school's Code of Conduct. The DSL will ensure that all staff and volunteers have read the child protection policy and staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- Staff should be aware of the school's Behaviour Management and Physical Intervention Policies, and any physical interventions must be in line with agreed policy and procedures and national guidance.
- A list of staff that have accessed Team Teach physical intervention training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in-line with guidance.
- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Positive behaviour policy.
- If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with, for how long. Doors, ideally, should have a clear glass panel in them and be left open.

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- Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in Guidance for safer working practice for those working with children and young people in education settings May 2019 (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the school's Online Safety Policy and Acceptable ICT Use Policy.

## **16 Staff Supervision and Support**

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff will be supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
  - The DSL and DDSs have regular supervision which is timetabled and non-negotiable. If it is felt that any other member of staff needs supervision, this is also put into place.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **17 Safer Recruitment**

- City of Rochester School values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- City of Rochester School will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the school in deciding about the suitability of the prospective employee.
- The school will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online, which may be relevant to their suitability to work with children and/or may have an impact on the school's reputation.
- The Trustees will ensure that at least one of the persons who conducts the interview has completed safer recruitment training. At all times the Headteacher and Trustees will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*', DfE (2023).
- Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: Safeguarding Children and Safer Recruitment)
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

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- We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child. The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment

## **18 Allegations Against Members of Staff including Supply Staff, Contractors and Volunteers**

- City of Rochester School recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior Leadership Team.
- City of Rochester School understands the duty to refer to the LADO where it is alleged that anyone working in the school has:
  - behaved in a way that has harmed a child, or may have harmed a child.
  - possibly committed a criminal offence against or related to a child.
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- In depth information regarding staff allegations can be found within our Procedures for Managing Allegations against Staff policy. This can be found on the staff shared area. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the schools safeguarding regime. The Leadership Team at City of Rochester School will take all concerns or allegations received seriously.
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:
  - Allegations should be referred immediately to the Head Teacher or deputy in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway [LADO Leaflet](#) if you need further information.
  - In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the Chair of Trustees who will contact the LADO in the first instance.
  - Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Trustees should contact the LADO directly on 01634 331065.
  - The Headteacher or Chair of Trustees will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Trustees will undertake further investigations before receiving advice from the LADO.
- Where headteachers are unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service
- City of Rochester School has a legal duty to refer to the [Disclosure and Barring](#) Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a

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number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.

- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

### 18.1 Concerns that do not meet the 'harms threshold'

- **City of Rochester School's** Staff Code of Conduct explains what a low-level concern is and the importance of sharing concerns. We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures are in place for confidentially sharing, recording and handling of low-level concerns. A form is available for reporting concerns in Appendix 7.
- A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') that a member of staff has acted in a way that:
  - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
  - does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse.
- All Low-Level Concern Forms need to be given to the Designated Safeguarding Lead.
- Where low-level concerns are reported, the headteacher/principal should share or liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
- The Medway LADO policy states that all allegations, including low level are considered with the LADO, please communicate and engage with the LADO in relation to all low-level concerns.
- City of Rochester School staff code of conduct explains what a low-level concern is and the importance of sharing concerns.

### 18.2 Whistleblowing Procedure

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Leadership Team. All members of staff are made aware of the schools Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 19 Safeguarding Children with Special Educational Needs and Disabilities

- City of Rochester School understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These children may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the SENDco **Sophie Hatcher** to plan support as required.
- Autism is recognised as a disability, and some disabled children and adults may be more vulnerable to abuse than non-disabled people. This may be because some autistic people can experience differences with

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communication, social interaction, or have difficulty understanding other people's motives. Some may also be less able to recognise or report abuse. This requires professionals to be more vigilant with regard to recognising, reporting and investigating potential signs of abuse as well as ensuring that safeguarding issues remain on the agenda when working with children and young people on the autism spectrum.

- All staff will ensure that children with SEN and disabilities will be able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties will be supported to make sure that their voice is listened to and acted upon.
- It is important that all staff are aware that children with SEN and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying and exploitation without outwardly showing signs.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities.

## 20 Curriculum and Staying Safe

- [Working Together to Safeguard Children \(2018\)](#) states that the curriculum should ensure opportunities for "developing children's understanding, awareness and resilience".
- Schools play a pivotal and essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- The school uses the PSHE and RSE curriculum to increase self-esteem, self-awareness and social and emotional understanding, assertiveness and decision making this ensures that our pupils have a range of strategies to ensure their own protection and that they are able to also protect others. Online safety is also integrated into the curriculum
- The school ensures that teachers that teach the PSHE curriculum have been trained and equipped to deliver high quality PSHE education in a safe way.
- Children feel they can talk to a range of staff when they feel they are worried and can feedback about their school experience. Children at City of Rochester School will be listened to, heard and their concerns will be taken seriously and acted upon as appropriate.
- Other systems that exist outside of expected day to day classroom interaction and support include Posters on staying safe for children around the school, Child friendly safeguarding policy on school website.

## 21 The Use of School Premises by Other Organisations

**City of Rochester School does not hire out, or allow any other organisation/individual to use its premises.**

## 22 Security

- City of Rochester School has a responsibility to provide a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore, all staff and people on the site have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff will be expected to adhere to any safety arrangements implemented should Covid-19 restrictions need to be reintroduced.

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- Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass. School has a clear system of ensuring visitors are to be accompanied/supervised by regulated staff member. City of Rochester school staff have a **navy blue** lanyard, if a visitor that has a green lanyard they are able to be unsupervised as they have the appropriate enhanced DBS and other clearances. If the visitor has a **red** lanyard they are to be supervised at all times.
- City of Rochester School will not tolerate or accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe). This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.
- Any individual on site who is not known or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

### 23 Monitoring and Review

- All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/Carers
- This policy has been written in September 2023 to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare.
- All staff will have access to this policy and sign to the effect that they have read and understood its contents. The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.
- The policy forms part of our school development plan and will be reviewed annually.

### 24 Local Support

- All members of Staff in City of Rochester School are made aware of local support available.

If a child may be at risk of **imminent harm**, you should call **Children's Services First Response Team on 01634 334466** and/or the **Police on 999**

- **Contact details for The Medway Education Safeguarding Service**

- **Education Safeguarding Officer**

Kate Barry (**Non Working Day Wednesday**)

01634 331017

[kate.barry@medway.gov.uk](mailto:kate.barry@medway.gov.uk)

- **Education Safeguarding Officer**

Fiona Veitch (**Non Working Day Friday**)

01634 331464

[Fiona.veitch@medway.gov.uk](mailto:Fiona.veitch@medway.gov.uk)

- **Safeguarding Service Manager**

Maisie Adkins

01634 331065

[maisie.adkins@medway.gov.uk](mailto:maisie.adkins@medway.gov.uk)

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- **Education Lead in MASH – For MASH Related Enquiries only.**  
Harriet Obrien  
01634 331025  
[harriet.obrien@medway.gov.uk](mailto:harriet.obrien@medway.gov.uk)
  
- **Contact details for the LADO:**  
Telephone: 01634 331065  
Further information and contact details found: [Advice and resources for professionals](#)
  
- **Children’s Social Work Services**  
First Response: 01634 334466 (Monday to Friday from 9am to 5pm)  
Out of Hours: 03000 419 191
  
- **Kent Police**  
101 (or 999 if there is an immediate risk of harm)
  
- **Medway Safeguarding Children Partnership (MSCP)**  
[mscp@medway.gov.uk](mailto:mscp@medway.gov.uk)  
01634 336 329
  
- **Local Support - Kent**
  - **Contact details for Area Safeguarding Advisor (Education Safeguarding Service)**  
[www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts](http://www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts)  
North Kent 03000 41 24 45
  
  - **Contact details for Online Safety in the Education Safeguarding Service**  
03000 415797  
[esafetyofficer@theeducationpeople.org](mailto:esafetyofficer@theeducationpeople.org) (non-urgent issues only)
  
  - **Contact details for the LADO**  
Telephone: 03000 410888  
[kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
  
  - **Integrated Children’s Services**  
Front door: 03000 411111  
Out of Hours Number: 03000 419191
  
  - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**  
[kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)  
03000 421126

## 25 National Support

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Pupils

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

### Support for adults

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



## APPENDIX 1: Definitions of Forms of Abuse/Specific Safeguarding Issues

### Definitions of Forms of Abuse

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Please click on the hyper link for further information, advice and guidance: [NSPCC Physical Abuse](#)

- **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 from 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.

Please click on the hyper link for further information, advice and guidance: [NSPCC Emotional Abuse](#)

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

Please click on the hyper link for further information, advice and guidance: [NSPCC Sexual Abuse](#)

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Please click on the hyper link for further information, advice and guidance: [NSPCC Neglect](#)

## Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 2023

### Mental Health

- The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#).

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Every mind matters <https://www.nhs.uk/oneyou/>

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the [Link Programme](#). Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Domestic Abuse

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: <https://respectphonenumber.org.uk>

### Honour based Violence (FGM and Breast Ironing)

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- Information and resources <https://www.gov.uk/government/collections/female-genital-mutilation>
- FGM Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information:  
[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- National FGM Centre <http://nationalfgmcentre.org.uk/fgm/>

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## Contextual Safeguarding, Child on child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- [Supporting practice in tackling child sexual abuse - CSA Centre](#)

## Substance Misuse

- Drugs advice for Schools: [Gov.uk Drugs advice for schools](#)
- Talk to Frank <https://www.talktofrank.com/>
- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)

## Online Safety

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC/ Net Aware: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

## Radicalisation and hate

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

## **APPENDIX 2: Related Safeguarding Policies**

This policy is one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies as listed below: (to be read and followed alongside this document).

- Positive Behaviour Support
- Social Media
- Anti-Bullying
- Staff Behaviour
- Acceptable Use of ICT
- Mobile Technology
- Data Protection
- Relationships and Sex Education
- Health, Safety and Welfare
- Attendance
- Risk Assessments (e.g. school trips, use of technology)
- First Aid and Administration of Medication
- Recruitment, Selection and Disclosure
- Whistleblowing

## **APPENDIX 3: Procedure for dealing with disclosures (the 6 R's – what to do if)**

### **1. Receive:**

- Listen to what is being said without displaying shock or disbelief you display denial to a child or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

### **2. Reassure:**

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now".
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

### **3. React:**

- React to the student only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell explain describe
- Do not criticise the perpetrator; the student may have affection for him/her
- Do not ask the student to repeat it all for another member of staff
- Explain what you have to do next and who you must talk to

### **4. Record:**

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used by the child
- Record statements and observable things, not your interpretations or assumptions – keep it factual.

### **5. Remember:**

- Contact the designated member of staff
- The designated teacher may be required to make appropriate records available to other agencies

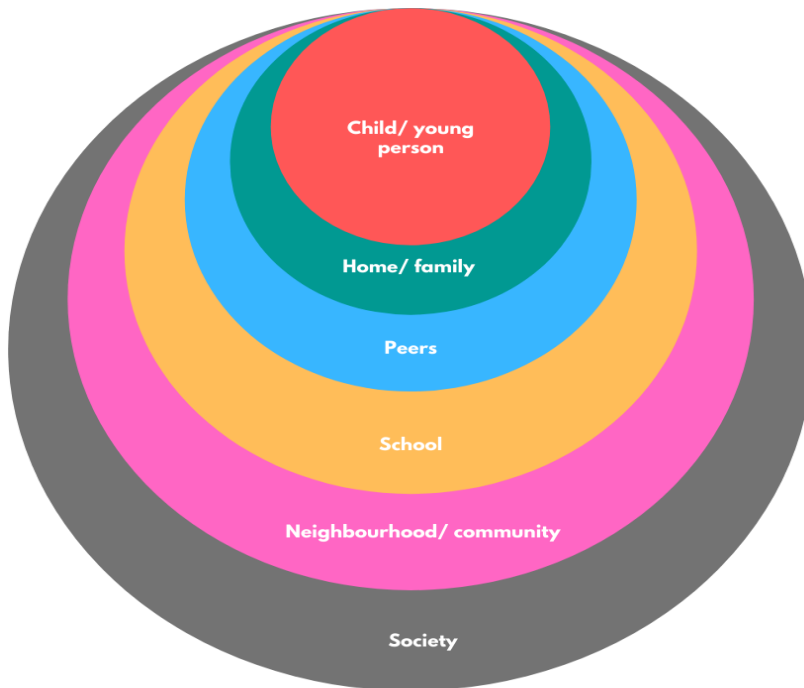
### **6. Relax**

- Get some support for yourself

## APPENDIX 4

### Extra Familial Harm - Contextual safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighborhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding can be simply illustrated as:



#### Contextual Safeguarding – Areas of Risk

Contextual Safeguarding is applicable to a wide range of risks which can potentially cause significant harm to children and young people where the prime cause of harm is outside of the family. This list isn't exhaustive but includes:

- Child on child and relationship abuse
- criminal/ sexual exploitation/ online abuse
- missing episodes
- risks associated with gangs
- risks associated with radicalisation
- safeguarding risks in public spaces
- trafficking and modern slavery

#### Importance of Context:

As children move from early childhood and into adolescence they spend increasing amounts of time socialising independently of their families. During this time the nature of young people's schools and neighbourhoods, and the relationships that they form in these settings, inform the extent to which they encounter protection or abuse. Evidence shows that, for example: from robbery on public transport, sexual violence in parks and gang-related violence on streets, through to online bullying and harassment from school-based peers and abuse within their intimate relationships, young people encounter significant harm in a range of settings beyond their families.

***'Safeguarding is everyone's responsibility' is often interpreted as making referrals and sharing information' We need to think about taking it further and not only think about the individuals but also the context in which the harm occurs. Always consider the environment as well as the individual.***

***What is the context?***

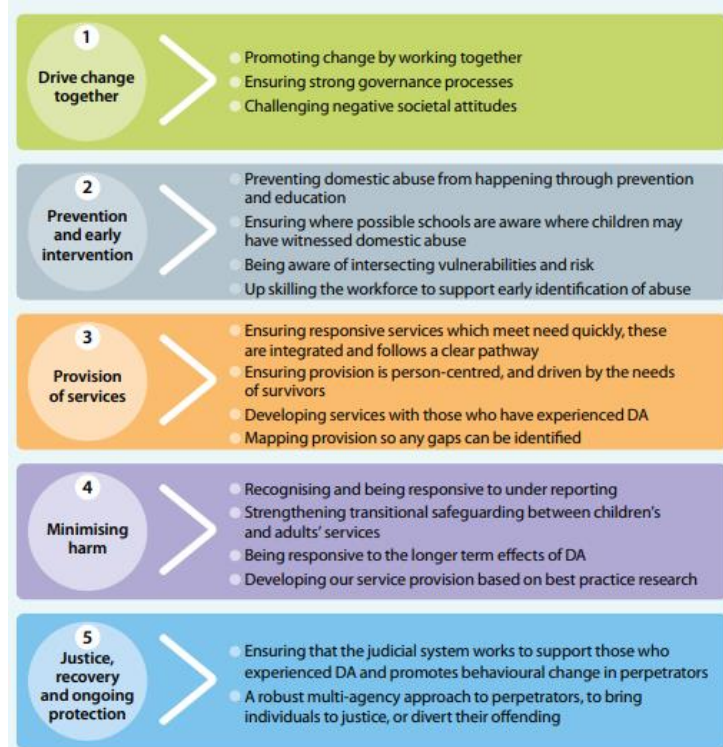
**[TED Talk Contextual Safeguarding: Re-writing the rules of child protection](#)**

## Local Context

### Medway Community Safety Partnership Priorities 2020 onwards (County Lines, Exploitation and Serious Violence)

- Kent Fire and Rescue Service to support Pupil Referral units where requested and work with disaffected children at school delivering youth work around road, water and fire safety.
- Medway Task Force - To develop a Safety in Action initiative with all partners for Medway Year 6 pupils to develop resilience for young people moving into secondary education
- Medway Task Force - To work with key schools to support them in preventing their pupils from becoming victims and perpetrators of violent crime or drug involvement
- Medway Task Force - To work with identified young people at risk of offending to deter them from criminality
- Medway Council – Develop a targeted youth work programme to tackle community hot spots.
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- Medway Task Force - To work closely with partners to identify and target harden those places and spaces where adults and young people are at greater risk of exploitation.
- Medway Task Force - To work with partners to respond to individuals and families who have multiple vulnerabilities to provide the necessary support to prevent them from becoming victims or perpetrators of crime.
- Kent Fire and Rescue Service - fire setter visits to children and young people that have started fires or have shown in interest in starting fires and complete safer driver interventions for older drivers and passengers.
- Medway Council – Creation of a new team within Children’s Services to support children in need of help.
- Medway Council – Improved focus on steps downs from YOT to Early Help.
- Medway Council – Services to be support in using risk tools to identify needs and vulnerability and impact (prevent, CSE, Missing).
- Medway Council – Increased awareness of the risk of radicalisation.
- Public Health - PHSE materials and training for schools.

### Kent and Medway Domestic Abuse Strategy 2020 – 2023



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## APPENDIX 5

### When to call the police?



The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- [When to call the police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

This advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Contact with police should ideally be made by a single point of contact from the school. This may be the Headteacher or the designated safeguarding lead to ensure all the relevant information is shared and improve consistency of referrals.

When an incident occurs in which a crime has or may have been committed, the school or college need to consider whether to involve the police. Many incidents can be dealt with and resolved internally. The school or college behaviour policy will give guidance on how to deal with and record such incidents. In making a decision to involve the police it is important that the school or college ensure a balance is struck between the needs of the students involved and the needs of other students and the wider school or college community.

The victim in any incident should be supported and protected as a priority. Those suspected of being the offender will also need to be supported. There will often be significant circumstances in a young person's life that are contributing factors to an incident and it is important that they are taken into consideration. The seriousness of the incident will be a judgement call for the school or college. In making this decision the level of harm and the circumstances leading to the incident would need to be carefully considered.

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the school or college should cease their own investigation, having asked only enough questions to establish the basic facts of the incident. Every effort should be made by the school or college to preserve any relevant evidence.



## APPENDIX 6

### Managing Allegations Against Staff

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

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

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

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

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

#### Suspension of the accused until the case is resolved

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

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

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

#### Definitions for outcomes of allegation investigations

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

#### Procedure for dealing with allegations

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

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police

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*before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

### **Additional considerations for supply staff**

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome

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- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

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

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

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

#### **Individuals returning to work after suspension**

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

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

#### **Unsubstantiated or malicious allegations**

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

## **Confidentiality**

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## **Record-keeping**

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

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

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

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

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

## **References**

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

## **Learning lessons**

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

This will include consideration of (as applicable):

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

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**APPENDIX 7**

**Low Level Concern Form**

This form can be used to share any concern with the Designated Safeguarding Lead/Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that is inconsistent with the Schools’ Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, ‘harm’ threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, timed and dated.

**Details of CONCERN :**

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<b>Name of Staff member :</b>	<b>Role:</b>
<b>Signed :</b>	<b>Time and Date :</b>

<b>Received by :</b>
<b>At [time] :</b> <span style="float: right;"><b>Date :</b></span>

<b>WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].</b> <b>NO <input type="checkbox"/> - Give a brief but valid reason/explanation for not;</b>
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YES  - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

**ACTION TAKEN :**

Was advice/guidance sought from the LADO and or Mentor? Yes :  No :

**Signed :**

**Dated :**

This record form will be held securely, in paper form, in one central file in the Headteacher's office.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.