



Kent College Pembury

Child Protection and Safeguarding Policy

This Policy applies to the Whole School, including EYFS and Boarding

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

Date written: September 2025

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Date agreed and ratified by Governing Body/Management Committee: September 2025

Date of next full review: September 2026

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

Key Contacts

	Name	Contact information
Designated Safeguarding Lead (DSL)	Louise Payne	Paynel@kentcollege.kent.sch.uk 01892 822006
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What to do if you have a welfare concern at Kent College Pembury

Why are you concerned?

For example

- Something a child has said – e.g. allegation of harm
- Child's appearance – may include frequent or unexplained injuries/marks/bruises and/or dress
- Behaviour change
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the school procedure

- Reassure the child
- Clarify concerns, using open questions if necessary (**T**ED: **T**ell, **E**xplain, **D**escribe)
- Use child's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Louise Payne, Deputy Head)

Inform the Designated Safeguarding Lead (Louise Payne, Deputy Head)

Designated Safeguarding Lead

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent [Request for Support to the Front Door Service via the portal](#) or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with [Kent Safeguarding Support Level Guidance and KSCMP procedures](#), as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the [Front Door Service Portal](#).
- Where the [school/college believes a child may be in need of support but is unclear where to refer](#) a [no-named consultation](#) can be sought from the Front Door Service via **03000 411 111**
- Where support is required out of working hours, contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures
- Follow Kent [safeguarding partnership escalation](#)

Pupils and Parents:

- Follow school complaints procedures available from the school website and the school office.

Record decision making and action taken in the pupil's child protection file

Monitor

Be clear about:

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

Review and request further support if necessary

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

1. Child Focused Approach to Safeguarding

1.1 Introduction

- Kent College Pembury recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, 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.
- Kent College Pembury believes that the best interests of children always come first. 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, sexual identity or orientation, have equal rights to protection.
- Staff working with children at Kent College Pembury will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend Kent College Pembury but may also apply to other children connected to Kent College, for example, siblings, younger members of staff (under 18) or children on student/work placements.
- Kent College Pembury recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide. To support children who may not wish to directly speak with an adult in the school there are other means such as worry boxes and email addresses which are monitored by key staff in the safeguarding team
- Kent College Pembury recognises the need for a trauma-informed approach to safeguarding, considering the root causes and possible underlying trauma behind childrens' behaviour.
- To support children who may wish to seek help from beyond the school we have posters and signposting to agencies such as Child Line or the NSPCC.
- As well as systems for individual children to raise concerns, Kent College Pembury also gathers student voice to understand the experience of students at the school, so that this can inform the development of safeguarding practice. We always aim to capture the full breadth of the student demographic, including students with SEND and those who are known to be vulnerable.
- So that children are supported to identify and manage risk in their lives, Kent College Pembury teaches a range of knowledge through specific topics related to safeguarding as part of a broad and balanced preventive curriculum.
- Although some curriculum areas are better placed for the delivery of teaching and learning around some areas, e.g. IT lessons can lead on online safety and PSHE can lead on healthy relationships, all teachers recognise that there are opportunities to reinforce the learning around these topics within all subject areas and will plan to do so. Non-teaching members of staff recognise that they too can support learning in these areas through broader modelling of behaviours or messages.

- The use of technology is a significant component of many safeguarding issues so as part of a whole school approach to safeguarding, Kent College Pembury has a separate Online Safety Policy which covers this area of work. This policy includes details of how internet use at the school is filtered and monitored and how the school teaches children to stay safe online whether they are at school or at home and how we communicate with parents to reinforce the importance of children being safe online.
- Kent College Pembury recognises that abuse may occur in a range of situations: within families or households, within the community, or online or face to face. We also recognise too that it is not only adults who may abuse children but also that children can abuse other children as well.
- Kent College Pembury recognises that just because children are not raising concerns, that is not to say that there are no concerns. For example, there may be no reported cases of child-on-child abuse, but such abuse may still be taking place and is simply not being reported, this is why it is so important to listen to children, teach them about risk and safety and raise awareness around how to seek support and what the school will do.
- Our core safeguarding principles are:
 - **Prevention**
 - positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
 - **Protection**
 - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support**
 - for all pupils, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
 - **Working with parents and other agencies**
 - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within Keeping Children Safe in Education (KCSIE).
- This policy should be read alongside the [MIST Safeguarding Policy](#) [Methodist Independent Schools Trust - Methodist Schools](#)

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:
 - Keeping Children Safe in Education (KCSIE)
 - Working Together to Safeguard Children (WTSC)
 - Information sharing: advice for practitioners (DfE 2024)
 - Working Together to Improve School Attendance
 - Ofsted: Education Inspection Framework
 - Prevent duty guidance, revised 2021
 - Framework for the Assessment of Children in Need and their Families 2000
 - Kent and Medway Safeguarding Children Procedures [Kent and Medway Safeguarding Children Procedures](#)
 - Early Years and Foundation Stage Framework (EYFS)
 - The Education Act 2002
 - Education and Inspections Act 2006
 - The Education (Independent School Standards) Regulations 2014
 - The Human Rights Act 1998
 - The Equality Act 2010 (including the Public Sector Equality Duty)
 - Relationships Education, Relationships and Sex Education (RSE) and Health Education 2019
 - The National Minimum Standards for Boarding Schools
- The Education (Independent School Standards) Regs 2014 require that proprietors make arrangements to safeguard and promote the welfare of pupils at the school. Such arrangements will have regard to any guidance issued by the Secretary of State.
- Kent College Pembury will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

1.3 Definition of Safeguarding

- In line with KCSIE and [Working Together to Safeguard Children](#), safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether the risk of harm comes from within the child's family and / or outside (from the wider community), including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering significant harm. This includes harm that occurs inside or outside the home, including online.

- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Child-on-Child abuse
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - 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
 - 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
 - Children who are absent from education for prolonged periods and/or on repeat occasions

(Also see Part One and Annex B within ‘Keeping Children Safe in Education’ 2024)

1.4 Related Safeguarding Policies

- This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - Behaviour (Rewards and Consequences) policy , including use of physical intervention
 - Online Safety (and ICT Acceptable Use Policy)
 - Anti-Bullying
 - Data protection and Information sharing
 - Image use
 - Relationship and Sex Education (RSE)
 - Health and safety,
 - Attendance Policy
 - AI Policy
 - Risk assessments (e.g. school trips, use of technology, school re-opening)
 - Managing allegations against staff
 - Staff Code of conduct, including Acceptable Use of Technology Policies (AUP)

- Safer recruitment
- Whistleblowing
- MIST whistleblowing procedure
- PSHE Policy
- Medical (Administration of Medicines)

Supporting Guidance (to be read and followed alongside this document)

- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - [Safer Recruitment Consortium](#)
- [What to do if you are worried a child is being abused](#)
 - [Early Years Foundation Stage \(EYFS\) Statutory Framework: The Safeguarding and Welfare Requirements](#)

1.5 Policy Compliance, Monitoring and Review

- Kent College Pembury will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One or Annex A of KCSIE 2024 as appropriate. This is readily available on the website and from HR.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website.
- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and Head will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The governing body have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

- The governing body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The school has a nominated governor for safeguarding and Prevent. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The governing body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The Head will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.

2.2 Designated Safeguarding Lead (DSL)

- The school has appointed Louise Payne, a member of the senior leadership team as the Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school. 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 school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
 - Tiz Youdale, Teacher
 - Rachel Cole, Early Years Leader
 - Cheryl Johnson, Pastoral Lead
 - Olivia Cottrell, School Nurse
 - Helena Levett, SENCO
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2024. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns
 - Maintaining a confidential recording system for safeguarding and child protection concerns
 - Coordinating safeguarding action for individual children
 - When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
 - Liaising with other agencies and professionals in line with KCSIE and WTSC

- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the [Kent Safeguarding Children Multi-Agency Partnership](#) procedures (KSCMP), including referrals, are followed, as necessary.
 - Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
 - Managing and monitoring the school role in any multi-agency plan for a child.
 - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
 - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
 - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Liaising with the Head to inform them of any safeguarding 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 ([PACE Code C 2019](#)).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3 Members of Staff

- Our staff play a particularly important role in safeguarding as they are in a position to observe changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
 - All members of staff have a responsibility to:
 - Provide a safe environment in which children can learn.
 - Be alert to any issues of concern in a child's life at home or elsewhere.
 - Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
 - Know what to do if a child tells them that they are being abused or neglected or exploited and understand the impact this can have upon a child.
 - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
 - Be prepared to identify children who may benefit from Early Help and understand the Early Help process and their role in it.
 - Understand the school safeguarding policies and systems.
 - Undertake and engage regular and appropriate training which is regularly updated.
 - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - Know how to maintain an appropriate level of confidentiality.
 - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - Act in line with our staff code of conduct.
 - Act in line with Teachers' Standards which state that teachers (including headteachers) should

safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

- EYFS staff are aware of the restrictions around the use of mobile phones and cameras in the setting.
- Staff at Kent College Pembury recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
- School staff will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff code of conduct and the pupil behaviour policy (Rewards and Consequences policy).

2.4 Children and Young People

- Children and young people (pupils) have a right to:
 - Feel safe, be listened to, and have their wishes and feelings taken into account.
 - Confidently report abuse, neglect and exploitation knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - Contribute to the development of school safeguarding policies.
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe, including online.

2.5 Parents and Carers

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

3. The management of safeguarding

- We recognise that safeguarding is not a discrete area of work: there is a safeguarding dimension to almost every area of school practice. As part of our whole school approach, and to ensure a holistic view of all children, we have structures and systems in place, such as scheduled meetings and shared databases, to ensure that the DSL has oversight of areas of school organisation which may not fall directly within their remit but may impact upon effective safeguarding. These areas include behaviour, attendance, medical needs, first aid, SEND and bullying. Information from these areas will be factored into safeguarding decision making for individual children so that their needs are considered holistically.
- We will ensure that the DSL is kept informed of any incident of physical intervention with a child and will be aware of behaviour plans for specific children. See Behaviour (Rewards and Consequences) Policy for further information.
- We will ensure that the DSL is kept informed of attendance patterns, and where there are concerns for individual children the response to this will be considered within the context of safeguarding. See Attendance Policy for further information.

- We will ensure that the DSL is kept informed of arrangements for first aid and children with medical conditions and is alerted where a concern arises, such as an error with the administering of medicines or intervention, or repeated medical appointments being missed, or guidance or treatments not being followed by the parents or the child.
- Systems are in place to ensure that hate incidents, e.g., racist, homophobic, transphobic, gender or disability-based bullying and cyberbullying, are reported, recorded, and considered under safeguarding arrangements by the DSL. See Behaviour (Rewards and Consequences), Anti Bullying and Online Policies for further information.
- The DSL links with curriculum leads, such as PSHE and ICT, to ensure that the curriculum supports the wellbeing and resilience of pupils and teaches them about risk assessment and safeguarding issues, such as healthy relationships and online safety. See PSHE/RSE/Online Safety Policies for further information.

4. Child Protection Procedures

4.1 Recognising Indicators of Abuse, Neglect and Exploitation

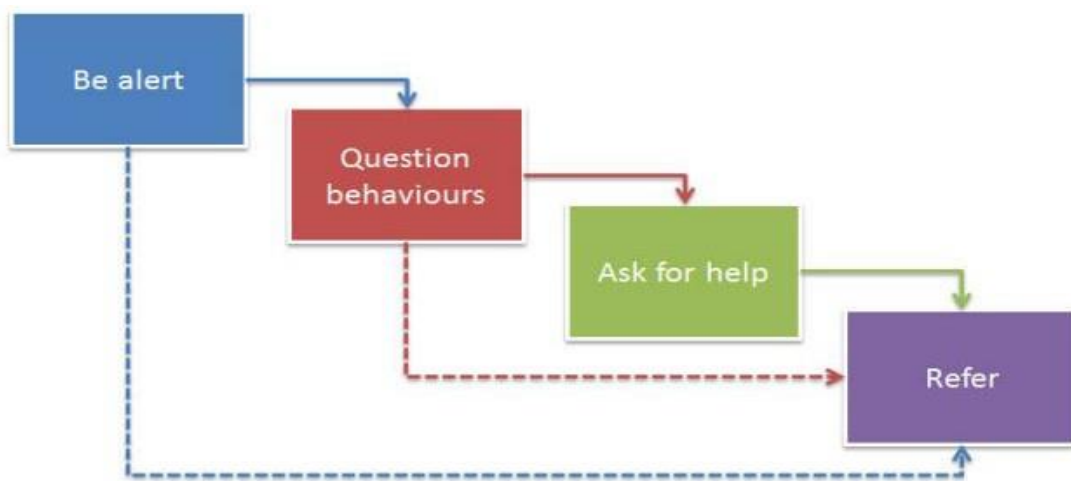
- Staff will maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children) and Keeping Children Safe in Education . This is outlined locally within the Kent Support Levels Guidance.
- Kent College Pembury recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect

For further information see Appendix 1.

- Kent College Pembury recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Kent College Pembury recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate child abuse, neglect and exploitation, so staff will 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.
- 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.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School.

Children can be at risk of abuse, neglect 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, sexual abuse, serious youth violence and county lines.

- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know. Children can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



'What to do if you are worried a child is being abused' 2015

- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).
- Kent College Pembury recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them. Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the school 'Searching, Screening and Confiscation' policy and Behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.
- The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our Behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
- Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

4.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to the child, reflecting back the concern
 - use the child's language
 - be non-judgmental.
 - avoid leading questions, only prompting the child where necessary with open questions to clarify information, e.g. who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern using the facts as the child presents them, in line with school record keeping requirements.
 - inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door (for contact information, see flowchart on page 37). In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- All staff are made aware 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 other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- Kent College Pembury will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
 - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of [Integrated Children's Services](#) (ICS) and are accessed via the 'Front Door Service' / [Kent Children's Services Portal](#).
 - 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
 - If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
 - Where Intensive Support Early Help (provided by ICS, outlined in the [KSCMP support levels guidance](#)) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the [Kent Children's Services Portal](#).

- Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.
- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), intensive or specialist support is required and a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the [portal](#)) and/or the police, in line with the [Kent Support Level Guidance and KSCMP procedures](#).
 - Kent College Pembury recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from a social worker via the Front Door Service before deciding next steps.
- The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals. However, all staff are made aware of the local process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy). If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.
 - Staff will speak to a member of the Kent College Pembury senior leadership team(Exec), request a consultation with a social worker from the Front Door Service, or make a request for support to the Front Door Service themselves; for contact information, see flowchart on page 3.
 - In these circumstances, any action taken by staff will be shared with a DSL as soon as is possible.

In the event of a request for support to the Front Door Service being necessary, parents/carers will be informed by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

- Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
 - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door if the situation does not appear to be improving or is getting worse.

- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [Kent Escalation and Professional Challenge Policy](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- DSLs and staff will be mindful of the need for Kent College Pembury to ensure any activity or support implemented to support children and/or families is recorded. Support provided by Kent College Pembury where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network
- Kent College Pembury is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.
- Kent College Pembury takes a trauma informed approach to supporting children, considering their lived experience, and factoring this into how we can best support them with their welfare and engage them with their learning.

4.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded either in writing or on the school safeguarding incident system (iSAMS) and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes and instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme etc.
- Safeguarding referral forms are available in the Senior School staffroom for colleagues who do not have access to iSAMS. These can be completed, sealed in an envelope and handed in directly to the DSL or via the Front Office marked for the attention of the DSL.
- Records of welfare concerns are kept electronically and accessible only to the welfare team.
- 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. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.

- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the special educational needs co-ordinators (SENCO), will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

4.4 Multi-Agency Working

- Kent College Pembury recognizes the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP 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.
- The School leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance. Some examples of multi-agency relationships may include, social workers, early help workers, health professionals (such as paediatricians, health visitors, mental health services and speech and language therapists), specialist teachers, education psychologists, other schools/settings where children attend more than one setting/provision and police.
- Kent College Pembury recognizes the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other Early Help multi-agency meetings.
- Kent College Pembury will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- Where a crime may have been committed the police will be informed as necessary (using the NPCC - [When to call the police](#) guidance to inform this decision).
- The Head and DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school 'Searching, Screening and Confiscation' policy and/or behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

4.5 Confidentiality and Information Sharing

- Kent College Pembury recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE
- Kent College Pembury has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements.
- The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on Kent College Pembury and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

- All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
- KCSIE, the Information Commissioner's Office (ICO), DfE Data Protection in schools guidance and DfE 'Information sharing advice for safeguarding practitioners' guidance provides further details regarding information sharing principles and expectations.
- The Head and DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this will include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing, staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services.
- All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

4.6 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on the website.

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

- If staff do not feel able to raise their concerns within school, they should follow the MIST whistleblowing procedure [insert link here]
- 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.
- The leadership team at Kent College Pembury will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with 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 8 of this policy.

5. Specific Safeguarding Issues

- Kent College Pembury is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2024 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

5.1 Child-on-Child Abuse

- All members of staff at Kent College Pembury recognise that children can abuse other children (referred to as child-on-child abuse) and that it can happen both inside and outside of school and online.
- Kent College Pembury recognises that child-on-child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between children
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2024 (in particular, part two and five).
- Kent College Pembury adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours, create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it
- Kent College Pembury recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff 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.
- Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.

- Kent College Pembury has additional factors to consider with regard to safeguarding due to having boarding students. With this in mind:
- Our approach to child-on-child abuse will reflect the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation. The rules about areas they can and can't go will be explained to boarders in the same meeting and consequences of this. Along with outline of child-on-child abuse and consequences of this.
- Our Boarding Houses will have clear guidance regarding how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems. There is a policy/guideline in place from an online safety perspective for boarders i.e. collect phones, on school Wi-Fi with filters etc.
- In order to minimise the risk of child-on-child abuse, Kent College Pembury will:
 - implement a robust anti-bullying policy
 - provide an age/ability appropriate PSHE and RSE curriculum
 - provide a range of reporting mechanisms and access to dedicated and experienced pastoral staff
 - acknowledge and reward acts of kindness in the school community
- Kent College Pembury wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child on child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by the pastoral and leadership teams.

5.2 Child on Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child on child sexual violence or harassment, Kent College Pembury will follow the guidance outlined in Part Five of KCSIE .
- Kent College Pembury recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here'. The school recognises that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. 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.
- Abuse that occurs online or outside of the school/college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies, for example anti-bullying, behaviour, child protection, online safety.

- Kent College Pembury recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.
- Kent College Pembury recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response. The DSL has completed Sexual Risk Lead's training and other key staff have undertaken AIM training.
- The DSL will make an immediate risk and needs assessment, using the AIM assessment tools where appropriate, which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2024 and relevant local/national guidance and support, for example [KSCMP](#) procedures.
 - 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.
 - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school/college and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
 - the wishes of the victim in terms of how they want to proceed.
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
 - the ages of the children involved.
 - the 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 - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
 - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - understanding intra familial harms and any necessary support for siblings following incidents.
 - whether there are any ongoing risks to the victim, other children, adult students, or school/ college staff.
 - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the Front Door Service.

5.3 Nude and/or Semi-Nude Image Sharing by Children

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.

The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non- consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older pupils.

- Kent College Pembury recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed the imagery by accident, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child 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. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - 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.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#) and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be 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.
 - All decisions and action taken will be recorded in line with our child protection procedures.
 - a referral will be made to ICS via the Children's Portal 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 the child or they have special educational needs.
 - 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.

- 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 Front Door Service.

5.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- Kent College Pembury recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- Kent College Pembury recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- The school recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect. Children can be vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.
- Criminal exploitation of children is a typical feature of County Lines criminal activity. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Key identifying features of involvement in county lines are:
 - going missing and are subsequently found in areas away from their home;
 - having been the victim or perpetrator of serious violence (e.g. knife crime);
 - being involved in receiving requests for drugs via a phone line, moving drugs,
 - handing over and collecting money for drugs;
 - being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;

- being found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity;
- owing a 'debt bond' to their exploiters;
- having their bank accounts used to facilitate drug dealing.

When children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

5.5 Serious Violence

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.
- Kent College Pembury recognises that the likelihood of involvement in serious violence may be increased by factors such as being male, having been frequently absent or permanently excluded, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Additionally, violence can peak in the hours just before or just after school, when students are travelling to and from school and these may be particularly risky times for children involved in serious violence.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. 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.

5.6 So-called Honour Based Abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers (see FGM below)

5.7 Preventing Radicalisation

- Kent College Pembury is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

- Kent College Pembury recognises that children may be susceptible to radicalization into terrorism and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.
- All staff have received appropriate training to enable them to be alert to changes in children's behaviour which could [indicate that they may need help or protection from radicalisation](#).
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.
- Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

- Some children are at risk of being radicalised, adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline. The School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism. The School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow. If there is an immediate threat, the police will be contacted via 999.
- The school will refer anyone for whom there are concerns of radicalisation to Prevent.

5.8 Cybercrime

- Kent College Pembury recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL

or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection and other appropriate policies.

5.9 Domestic Abuse

- Kent College Pembury recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse. Children can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children’s health, well-being, development, and ability to learn.
- Domestic abuse is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse. The school is enrolled onto the Operation Encompass scheme, a joint project between Kent Police and Kent schools; where every school day the DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse. Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child’s welfare.
- Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

5.10 Child Abduction and Community Safety incidents

- Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
- As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org , and teachers should ensure this is referred to as necessary.

5.11 Children and the Court System

- Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides (on gov.uk) to support children: 5-11 year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service (which may be useful for parents, guardians and carers). Staff should make themselves of this guidance.

5.12 Children with family members in prison

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

5.13 Modern slavery and the National Referral Mechanism (NRM)

- This section is included here because it has significant areas of overlap with CSE, CCE and County Lines. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
- A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.
- Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The School is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at School and make reasonable enquiries with the child and parents to assess this risk.

5.14 Homelessness

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.
- In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their

exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

5.15 Female Genital Mutilation (FGM)

- Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. Whilst all staff should speak to the Designated Safeguarding Lead (or their deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers and other professionals such as nurses which requires them to report to the police 'known' cases of FGM in under 18s, identified in the course of their professional work. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales to personally report to the police where they discover FGM appears to have been carried out.
- It will be rare for teachers to see visual evidence, and they should not be examining students however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).
- Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Children's Services should be informed as appropriate
- If a teacher / school nurse is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher / nurse should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.
- School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the School's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.
- There should also be consideration of potential risk to other girls in the family and practising community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate. There are no circumstances in which a teacher or other member of staff should examine a girl.

5.16 Forced Marriage

- A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.
- Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

- The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in 2024 which means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. This will prevent forced marriages which can cause lasting damage on a child and forms part of the government's continued commitment to tackle violence against women and girls.
- It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.
- A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. Staff should report any concerns to the DSL

5.17 Mental Health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

6. Supporting Children Potentially at Greater Risk of Harm

Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

- Kent College Pembury will support all students by ensuring that all staff have a clear understanding of the needs of the children they are working with and understand that whilst all children need to be protected some groups of children are potentially at greater risk of harm through additional vulnerabilities or circumstances.
 - Additional vulnerabilities and circumstances can include:
 - Looked after children
 - Previously looked after children
 - Children who are disabled or have certain health conditions and have specific additional needs
 - Children who have special educational needs (whether or not they have a statutory Education, Health and Care plan)
 - Children who have a mental health need
 - Children who are young carers
 - Children showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - Children frequently missing education, or persistently absent from school or not in receipt of full time education
 - Children who have experienced multiple suspensions, are at risk of being / has been permanently excluded from school and are in Alternative Provision or a Pupil Referral Unit

- Children at risk of modern slavery, trafficking, sexual or criminal exploitation
- Children in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- Children with a family member in prison, or who are affected by parental offending
- Children at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Children misusing drugs or alcohol themselves
- Children who have returned home to their family from care
- Children showing early signs of abuse and, or neglect
- Children at risk of being radicalised or exploited
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Privately fostered children
- Children who are absent from education for prolonged periods and/or on repeat occasions
- Children or a young people who identify as lesbian, gay, bi or trans (LGBT), or who are perceived by other children to be LGBT (whether they are or not)
- Being LGBT, or perceived to be, is not in itself an inherent risk factor for harm, but this group can be targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open, so as a school we endeavour to reduce any additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.
- Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect and exploitation in this group of children (whether or not they have a statutory Education, Health and Care Plan). These can include:
 - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
 - Being more prone to peer group isolation or bullying and cyberbullying (including prejudice based bullying) than other children.
 - The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
 - Communication barriers and difficulties in managing or reporting these challenges.
 - Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content and or behaviours in schools or colleges without understanding the consequences of doing so.
- We understand the additional vulnerabilities for young children, and we follow the guidance for safeguarding children up to the age of five set out in Section 3 of the Statutory Framework for the Early Years Foundation Stage September 2023.
- Kent College Pembury will ensure that our safeguarding systems are well promoted, easily understood and easily accessible to children
- Kent College Pembury will ensure that when children talk to an adult about a concern they may have they will always be taken seriously, they will always be supported and kept safe, and they will never be given the impression that they are creating a problem or have anything to feel ashamed about

6.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)

- Kent College Pembury acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect or exploitation
- Kent College Pembury recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

- All members of staff will be encouraged to appropriately explore possible indicators of abuse, neglect or exploitation such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENDCo (Mrs Nel Levett) to plan support as required.
- Our school has robust intimate/personal care policies which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems. Further information can be found in our policies.

6.2 Children Requiring Mental Health Support

- Kent College Pembury has an important role to play in supporting the mental health and wellbeing of our pupils. All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.
- The school has 2 part-time counsellors, once in Prep and one based in the Senior School. Pupils can self-refer and staff can also refer pupils to see the counsellors.
- The school has a separate Positive Mental Health and Wellbeing Policy for pupils. Age/ability appropriate education will be provided to pupils to help promote positive health, wellbeing and resilience.

6.3 Children Missing or Absent from Education

- Children missing and children who are absent from education, particularly on repeat occasions and/or for prolonged periods, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation – particularly county lines. A robust response to children missing or being absent from education will support the identification of such abuse and may help prevent the risk of children going missing or being absent from education in the future.
- Where possible, the school will hold more than one emergency contact number for each pupil so we have additional options to make contact with a responsible adult if a child missing or being absent from education is also identified as being a welfare and/or safeguarding concern.

- Where the school/college have concerns that a child is missing or being absent from education from education, we will respond in line with our statutory duties (DfE, Children Missing Education) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).
- Kent College Pembury follows the guidance on school attendance, [Working together to improve school attendance](#) September 2024, which informs how we work with the local authority children's services where school absence indicates safeguarding concerns.

6.4 Elective Home Education

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#) and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child. Where a child has an Education Health and Care plan the school will also liaise with the local authority who will need to review the plan closely with parents/carers and other relevant professionals.

6.5 Children who need a Social Worker (child in need and child protection plans)

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.
- Children who have a social worker due to safeguarding or welfare needs may be vulnerable to further harm due to experiences of adversity and trauma, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and positive mental health. Kent College Pembury will identify the additional needs of these children and provide extra monitoring and pastoral and/or academic support to mitigate these additional barriers. We recognise that even when social care intervention has ended, these additional barriers may persist, therefore so too will our additional monitoring and support.

6.6 Looked after children, previously looked after children and care leavers

- Kent College Pembury recognises the common reason for children becoming looked after is as a result of abuse, neglect or exploitation and a previously looked after child also potentially remains vulnerable.
- The school has appointed a '[designated teacher](#)' (Louise Payne, Deputy Head) who works with local authorities, including the Virtual School Kent (including the virtual school head), 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.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

- Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a close relative for 28 days or more) there is a legal duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

6.7 Children who are Lesbian, Gay, Bi, or Trans (LGBT)

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, the school recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- Kent College Pembury recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.
- When supporting a trans or gender questioning child, the school/colleges will consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

6.8 Children who are privately fostered

- [Private fostering](#) occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a close relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of Kent College Pembury, we have a legal duty to notify Kent Integrated Childrens Services in line with the local [KSCMP arrangements](#) in order to allow the local authority to check the arrangement is suitable and safe for the child.

7. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Kent College Pembury will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Kent College Pembury will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Kent College Pembury identifies that the breadth of issues classified within online safety is considerable, but

can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories
 - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce/Contract : risks such as online gambling, inappropriate advertising, phishing and or financial scams and sextortion (online sexual coercion and extortion of children).
- Kent College Pembury recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.
 - The Head will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

7.1 Policies and Procedures

- The DSL has overall responsibility for online safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) within the school but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, online safety and behaviour policies.
 - 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.
- Kent College Pembury uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
 - All School owned devices and those using the school's network and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Kent College Pembury recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2024 and EYFS 2021, Kent College Pembury has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found **on the website**.
- Kent College Pembury recognises that generative artificial intelligence (AI) tools may have many uses which could benefit our community. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to:

- Exposure to inappropriate or harmful content, including bullying and harassment, abuse and exploitation (including child sexual abuse),
 - privacy and data protection risks,
 - Intellectual property infringements
 - academic integrity challenges such as plagiarism and cheating,
 - exposure to accurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
- Staff and students will be made aware of the benefits and risks of using AI tools;
 - Kent College Pembury will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection and the AI policy.
 - Where Kent College Pembury believe that AI tools may have facilitated the creation of child sexual abuse material, the school will respond in line with local [KSCMP](#) guidance, and [national guidance](#) from the IWF and NCA-CEOP.
 - Where Kent College Pembury are responding to concerns regarding digitally manipulated and AI-generated nudes and semi-nudes, the school will respond in line with local safeguarding procedures and UKCIS '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' guidance.
 - Where the school believes that AI tools may have facilitated deep fake abuse of adults, advice and support will be provided to individuals affected such as via Unions, [Professionals Online Safety Helpline](#) or [Report Harmful Content](#) and/or if a crime has been committed, via the police. Action will be taken in line with the relevant school policies, including but not limited to anti-bullying, behaviour (Rewards and Consequences) and complaints.

7.2 Mobile and Smart Technology

- Kent College Pembury recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities.
- In accordance with KCSIE and EYFS Kent College Pembury has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

7.3 Appropriate Filtering and Monitoring

- Kent College Pembury will do all we reasonably can to limit children's exposure to online risks through school/college provided IT system. In line with the requirements of the Prevent Duty and KCSIE, will ensure that appropriate filtering and monitoring systems are in place.
- This includes ensuring application of appropriate filtering and monitoring to both static content, as well as dynamic and AI-generated materials, products and/or systems used.
- If pupils or staff discover unsuitable sites or material, they are required to **report the concern immediately to their teacher/ a member of the IT support staff, report the URL of the site to technical staff/services. The leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know to escalate concerns when identified.**
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - We will appropriately monitor the use of all Kent College Pembury provided devices and networks to detect safeguarding risks in real or near-real time, including accessing or attempting to access, or engaging with or attempting to engage with illegal and/or harmful/inappropriate content or activity by any user. This is achieved by the use of Securus and Senso monitoring software. Further information regarding this can be found in our Online Safety Policy and accompanying Acceptable Use of Technology policy.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and

- reported to the DSL who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - Parents/guardians will be informed of safeguarding concerns involving their child identified through our monitoring approaches, unless to do so would put a child at risk of harm or compromise a criminal investigation
 - When implementing appropriate filtering and monitoring, Kent College Pembury will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Kent College Pembury acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.
 - Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
 - Pupils’ internet use will be supervised by staff according to their age and ability.
 - Pupils will be directed to use age/ability appropriate online resources and tools by staff.

7.4 Information Security and Access Management

- Kent College Pembury is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils.
- Kent College Pembury will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

7.5 Remote/Online Learning

- Kent College Pembury 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 and any local/national guidance.
- All communication with pupils and parents/carers will take place using school/college provided or approved communication channels; for example, school/college provided email accounts and phone numbers and/or agreed systems: Teams, Microsoft 365 or equivalent.
Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school/college behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and pupils 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 policies.

7.6 Online Safety Staff Training

- Kent College Pembury will ensure that all staff receive online safety training (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and

considered as part of our overarching safeguarding approach.

7.7 Educating Pupils

- Kent College Pembury will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

7.8 Working with Parents/Carers

- Kent College Pembury will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children.
- Kent College Pembury will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online.
- Where the School/College is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE ['Harmful online challenges and online hoaxes'](#) guidance to ensure we adopt a proportional and helpful response.

8. Staff Engagement and Expectations

8.1 Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
 - School leaders, including the DSL will read KCSIE in its entirety.
 - All members of staff who work directly with children will read annex B.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. **This is monitored by HR and the DSL.**
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. The training is regularly updated and is in line with advice from the safeguarding partners.
- All governors and trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated every four years.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- Staff employed in the EYFS will have formal child protection & safeguarding training at least every two years;

this training will be relevant to the protection of children under the age of 5 and will cover all aspects listed in the EYFS statutory framework 2025 annex C

- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Kent College Pembury recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies.
- The DSL and Head will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained. The DSL and Head will issue and explain the policy or guidance which includes the safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.
- The governing body provides an annual report to MIST as the proprietor, detailing the safeguarding arrangements, inter-agency activity and arrangements in place to ensure effectiveness.

8.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school's code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read our child protection policy and are aware of the school expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff code of conduct, mobile and smart technology and Acceptable Use Policies.

8.3 Supervision and Support

- 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 ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2023.
- 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 are 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.

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

9. Safer Recruitment and Allegations

9.1 Safer Recruitment and Safeguarding Checks

- Kent College Pembury is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
 - Kent College Pembury will follow relevant guidance in Keeping Children Safe in Education (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
 - The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
 - The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Head and the DSL are responsible for ensuring that our single central record is accurate and up to date.
- Kent College Pembury are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 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 pupil 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.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in part Three of KCSIE .
- Where the school organises homestays as part of exchange visits, we will follow the advice and guidance as identified in Part Three and Annex E of KCSIE .

9.2 Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with the local Kent

allegations arrangements and Part Four of KCSIE. In depth information can be found within our staff code of conduct. This can be found in the school and HR office as well as the staff handbook.

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where the headteacher is unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteachers (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

9.2.1 Concerns that meet the 'harm threshold'

Kent College Pembury recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
 - possibly committed a criminal offence against or related to a child and/or;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Head who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. Once the LADO has been contacted, the Head will also inform MIST CEO.
 - In the event of allegations of abuse being made against the Head, staff are advised that allegations should be reported to the chair of governors who will contact the LADO and MIST CEO without delay.
 - Where there is a conflict of interest in reporting the matter to the Head, it must go straight to the LADO.
 - If allegations of professional misconduct are founded, the LADO may recommend a referral to the TRA.
 - If staff are concerned that appropriate safeguarding action is not being taken following an allegation against a colleague, they are advised to follow our whistleblowing process and/or to contact the LADO directly themselves.

9.2.2 Concerns that do not meet the 'harm threshold' – Low level concerns

- Kent College Pembury may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct and low-

levels concerns policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

- Kent College Pembury has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
 - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
 - Low-level concerns should be shared confidentially in line with our low-levels concerns policy (and code of conduct).
 - Where low-level concerns are reported to the school, the Head will be informed of all low level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
 - The Head will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
 - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
 - If the school/college is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
 - Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
 - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
 - Where a pattern is identified, the school/college will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.
 - If the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children, Kent College Pembury will respond, as with any safeguarding allegation, by following our safeguarding policies and procedures, including informing the LADO.

9.2.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be

reported and recorded.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Kent College Pembury will take all concerns or allegations received seriously.
- All members of staff are made aware of the school 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 may, if they prefer, contact MIST as the proprietor – see MIST whistleblowing procedure here [Methodist Independent Schools Trust - Methodist Schools](#)
- Alternatively, staff can 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.
- Kent College Pembury has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

9.2.4 Where an allegation is made against the headteacher this should be reported to the Chair of Governors who will liaise with the local authority, MIST and partner agencies.

10. Opportunities to teach safeguarding

- Kent College Pembury will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through RSE and PSHE.
- Kent College Pembury recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school/college approach which prepares pupils/students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- Kent College Pembury recognises that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse, neglect or exploitation and children with SEND.

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

11. Physical Safety

11.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. Further information regarding our approach and expectations can be found in our behaviour policy and is in line with the DfE 'Use of reasonable force in schools' guidance.

11.2 The Use of Premises by Other organisations

- Where services or activities are provided separately by another body using the school facilities/premises, the Head and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers and that they follow the safeguarding arrangements in [Safeguarding advice for providers](#); If this assurance is not achieved, an application to use premises will be refused.
- When services or activities are being provided separately by another body this will not necessarily be the case. The school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed)
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

11.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
This may include ensuring that all doors that require a passkey entry are closed, that door and barrier codes are not shared and that staff wear lanyards.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- For visitors attending in a professional capacity, such as social workers and early help staff, Kent College Pembury will check their ID and be assured that they have had the appropriate DBS check or their employers have confirmed that their staff have appropriate checks.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or

leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

11.4 Boarding and International Students

- Kent College complies with the National Minimum Standards and is appropriately inspected.
- Providing boarders with a 'voice' is a priority. Pupils are encouraged to speak up about anything that is of concern to them. They are made aware of the channels of communication open to them at the beginning of the academic year. An Independent Listener is available to any girl who may need an impartial listening ear.
- All new staff are vetted using DBS checks and once appointed undergo an induction process: Boarding staff receive induction training, both before taking up their role and ongoing, and this includes specific advice relating to safeguarding issues in a boarding community.
- If a member of the boarding staff is suspended pending investigation of a child protection matter, arrangements for alternative accommodation away from children will be made.
- Significant safeguarding incidents as well as risks to a pupil's safety at home is reported to the Boarding Schools Association. Their safeguarding lead is Dale Wilkins.
- For help and advice when dealing with issues relating to international students, go to International Social Services. <http://www.iss-ssi.org>

12. Local Support

- All members of staff in Kent College Pembury are made aware of local support available.
- **Kent Integrated Children's Services/ Children's Social Work Services**
 - [Kent Integrated Children's Services Portal](#) – select 'urgent' if there is an immediate risk/concern
 - Front Door Service No Name Consultation: 03000 411111
 - Out of Hours Number: 03000 419191
- **Local Early Help and Preventative Services and Family Hubs**
 - [Early Help and Preventative Services - KELSI](#)
 - [Early Help contacts - KELSI](#)
 - [Kent Family Hubs - Kent County Council](#)
- **Kent LADO Education Safeguarding Advisory Service (LESAS)**
 - [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#)
 - To refer to the LADO following an allegation being made against a member of staff, complete a referral on the [Kent Integrated Children's Services Portal](#).
 - To enquire if a LADO referral should be made, to request strategic education safeguarding or online safety advice, or request other LESAS commissioned services/support, please use the [LESAS enquiry form](#).
- **Kent Police**
 - 101 or 999 if there is an immediate risk of harm
 - Insert details for local support e.g. school officer.

- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - kscmp@kent.gov.uk
 - www.kscmp.org.uk
 - 03000 421126 or kscmp@kent.gov.uk
- **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect, exploitation and other 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:

Working Together to Safeguard Children (DfE 2023)

“A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children”

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes

- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect:

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (Working Together 2023)

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

KSCMP

- Factsheets: www.kscmp.org.uk/training/factsheets
- Supporting resources: www.kscmp.org.uk/training/training-resources
- Video explainers: www.kscmp.org.uk/training/video-explainers
- Missing children: www.kscmp.org.uk/guidance/missing-children

NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>
- NSPCC Whistleblowing helpline: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

Support for Pupils

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk
- Lucy Faithfull Foundation 'Shore Space': <https://shorespace.org.uk/>

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Special Education Needs and Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>
- Kent Autistic Trust: www.kentautistictrust.org/

- AFASIC: www.afasic.org.uk/
- National Autistic Society: www.autism.org.uk/
- Kent County Council: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children
- Portage: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-children-under-5/portage-supporting-pre-school-children-with-send

Information Advice and Support Kent (IASK): [www.iask.org.uk/Support for Learning Disabilities](http://www.iask.org.uk/Support%20for%20Learning%20Disabilities)

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- KSCMP: www.kscmp.org.uk/guidance/domestic-abuse
- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: <https://kentandmedwayvru.co.uk/>
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- The Children's Society: www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

So-called Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- 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
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage:

Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/
- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and Hate

- Kent Prevent Education Officers: www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education
- Educate against Hate
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>