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 2026
Date of last update: September 2025
Date agreed and ratified by Exec: September 2026
Date of next full review: September 2027

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
Deputy Designated Safeguarding Lead	Rachel Cole (EYFS) Cheryl Johnson Olivia Cottrell Helena Levett	coler@kentcollege.kent.sch.uk johnsonc@kentcollege.kent.sch.uk cottrello@kentcollege.kent.sch.uk levetth@kentcollege.kent.sch.uk 01892 822006
Head	Katrina Handford	head@kentcollege.kent.sch.uk 01892 822006
Safeguarding Lead	Ali Khan	ali.khan@alphaschools.co.uk
Proprietor	Ali Khan	ali.khan@alphaschools.co.uk

Contents

What to do if you have a welfare concern flowchart

1. Child Focused Approach to Safeguarding
2. Key Responsibilities
3. Management of Safeguarding
4. Child Protection Procedures
5. Specific Safeguarding Issues
6. Supporting Children Potentially at Greater Risk of Harm
7. Online Safety
8. Staff Engagement and Expectations
9. Safer Recruitment and Allegations Against Staff
10. Opportunities to teach safeguarding
11. Physical Safety
12. Local Contacts

Appendix 1: Categories of Abuse

Appendix 2: Support Organisations

What to do if you have a welfare concern at Kent College Pembury

Why are you concerned?

- Something a child has said – e.g. allegation of harm, disclosure or comment that causes concern
- Changes in appearance, presentation, behaviour, emotional wellbeing or attendance
- unexplained injuries/marks/bruises
- Witnessed or reported concerning, harmful or inappropriate behaviour, including online
- Concerns linked to family circumstances, peer relationships or wider community context

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

Follow the school procedure

- Reassure the child and listen carefully: do not promise confidentiality
- Clarify concerns, using open questions if necessary (**TED**: **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)

- If a child is at risk of immediate harm and/or is unsafe to go home, or requires urgent protection, 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, consider what support is needed in line with the Kent Support Level Guidance and KSCMP procedures. This may include internal support, signposting to community based early help services, contacting the Police, reporting allegations against staff to the LADO, or making a Request for Support to the Front Door Service via the Kent Children's Portal
- If the [school/college] believes a child may need support but is unclear whether a Request for Support is required, advice can be sought through a consultation from the Front Door Service via **03000 411 111**
- If 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 of

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, proprietor, 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. This policy applies to all children, including those living with birth parents or extended family, children in kinship care, adopted children, looked after children, previously looked after children and care leavers. Where safeguarding concerns relate to pregnancy, staff will also consider the help, support and protection needs of unborn children

- All children have equal rights to protection, regardless of age, sex, ability, culture, race, language, religion, belief, sexual orientation or identity. Kent College Pembury is committed to creating and maintaining an inclusive, anti-discriminatory safeguarding culture. Staff are expected to recognise and challenge racism, discrimination and prejudice, and to consider how these experiences may affect children's safety, welfare and access to support.

- 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. We recognise that children's behaviour, presentation and experiences should be understood in context. Staff will take a trauma-informed and child-centred approach, considering the possible root causes of behaviour and the impact of abuse, neglect, exploitation, discrimination, adversity and wider contextual or extra-familial harm

- 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 the proprietor and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within Keeping Children Safe in Education (KCSIE).

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.
- understands that significant harm is the threshold used to determine when statutory child protection intervention may be required. Under the Children Act 1989, "Harm" is the "ill treatment or the impairment of the health or development of the child". Harm can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child". There are no absolute criteria for determining significant harm. Significant harm may arise from a single serious incident or from a pattern of acute, longstanding, chronic or cumulative concerns which impair a child's health or development.

- recognises that safeguarding concerns are rarely isolated. Children may experience multiple and overlapping harms, including abuse, neglect, exploitation, online harms and extra-familial harm. Our safeguarding response will consider the full context of a child's lived experience, including their relationships, family circumstances, peer groups, community, online activity and wider environment.

Safeguarding includes a wide range of issues including, but not limited to:

- abuse and neglect
- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- child-on-child abuse
- children absent from education, missing from education, home or care
- children with family members in prison or affected by parental offending
- contextual safeguarding and extra-familial harm
- domestic abuse
- drugs and alcohol misuse
- exploitation, including child sexual exploitation and child criminal exploitation, group-based exploitation, county lines, gangs, serious violence, trafficking and modern slavery
- fabricated or induced illness
- gender-based abuse and violence against women and girls
- hate, discrimination and harmful prejudice
- homelessness
- honour or faith-based abuse, including Female Genital Mutilation and forced marriage
- mental health concerns
- online abuse and technology-assisted harm, including making or sharing nudes or semi-nudes
- preventing radicalisation and extremism
- private fostering
- sexual violence, sexual harassment, harmful sexual behaviour and relationship abuse

Further information about specific safeguarding issues can be found in Part One of Keeping Children Safe in Education.

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 Mobile Devices (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,
  - Acceptable Use of Computers (Staff) Policy;
  - Acceptable Use of Devices (Pupils) Agreement.
  - Safer recruitment,
  - Whistleblowing,

- 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 of the current version of KCSIE as appropriate. Staff will be expected to read and understand the relevant information as part of induction and ongoing safeguarding training . 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 Proprietor/ 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). This includes but is not limited to

safeguarding all members of the school community, including staff, parents/carers and other family members, who are identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

  - The governing body/proprietor and leadership team will promote an inclusive, anti-discriminatory safeguarding culture and ensure staff are supported to identify, understand and challenge racism, discrimination and disproportionality in safeguarding practice.

- 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.
  - Rachel Cole, Early Years Leader
  - Cheryl Johnson, Pastoral Lead
  - Olivia Cottrell, School Nurse
  - Helena Levett, SENCO

For the purposes of this policy, references to the DSL, includes the DSL and any appropriately trained deputies, however, Kent College Pembury recognises that 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 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 B of KCSIE. 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
- Managing referrals to the Front Door Service, the police, the Channel programme, the Disclosure and Barring Service and other agencies as required
- Working with others, including the head, senior leaders, relevant staff, social workers, early help services, Family Help workers, local authority services and other safeguarding partners.
-
- 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.

- During term time, the DSL will be available during school hours for staff to discuss safeguarding concerns. All staff are provided with the contact addresses of the each of the DDSLs and in addition there is a Safeguarding email address which is accessible by all team members (safeguarding@kentcollege.kent.sch.uk). Where the lead DSL is not available, safeguarding concerns that are added to ISAMS can be raised, received, monitored and acted on without delay by any member of the DDSL team. In addition, staff in school are informed of the absence of the DSL and directed to the DDSLS to ensure that there is appropriate cover.
- Kent College Pembury will ensure appropriate DSL cover arrangements are in place during any closures, out-of-hours activities and out-of-term activities arranged by the school. This information is provided on all email auto-replies for any member of the DSL team and Exec team. The auto-reply states which member of the safeguarding team is contactable on any given date. DSL cover is included in the Exec team on-call rota to ensure that members of staff are aware of who to contact when out of hours.
    - Ensuring all staff access appropriate safeguarding training, including online safety, and relevant updates in line with the recommendations within KCSIE.
    - being aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning.
    - ensuring child protection files are kept up to date, stored securely and transferred appropriately when a child moves setting.
    - 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, appearance, wellbeing and attendance, 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 systems within the school which support safeguarding, including this child protection policy, the staff code of conduct, the safeguarding response to children who are absent from education, and the role of the DSL
    - 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.
    - Maintain an attitude of professional curiosity and speak to the DSL if they have any concerns about a child.
    - be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
    - be prepared to identify children who may benefit from support before statutory intervention, including universal services, community-based Early Help, targeted early help through Family Help, and/or statutory support from children's social care, in line with the Kent Support Levels Guidance and local procedures.
    - understand the local process for seeking advice and making referrals, including Requests for Support to the Front Door Service, and for statutory assessments under the Children Act 1989, in line with the Kent Support Levels Guidance. This includes where a child may be in need, disabled, or suffering, or likely to suffer, significant harm.
    - Understand the school safeguarding policies and systems.
    - Undertake and engage regular and appropriate training, including online safety, 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 while understanding that early information sharing is vital to keeping children safe.
    - 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.

  - 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 . Staff are expected to understand these indicators in line with 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.

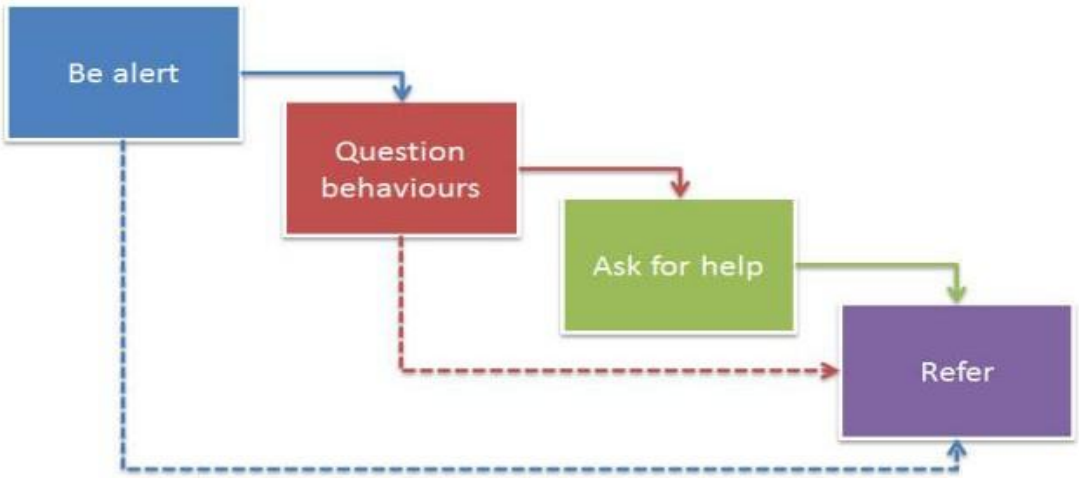
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

- 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 sexual abuse, sexual harassment and exploitation, domestic abuse within their own intimate relationships, criminal exploitation including financial exploitation, serious youth violence, county lines, online harms and radicalisation. Staff will report any concerns to the DSL in line with this policy, and the DSL will consider the wider context of the child's experiences when assessing risk and support needs

- 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 any child may benefit from support before statutory intervention is required. This may include support from universal services, community-based Early Help, or the targeted early help level of Family Help.
- 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).

- Kent College Pembury recognises that children should not be seen or relied upon as protective factors for adults. When considering family circumstances, adult vulnerabilities or parental needs, staff will remain focused on the child's needs, safety, welfare and lived experience. Staff will not assume that a child's presence, behaviour, affection, resilience or relationship with a parent/carer reduces risk, prevents harm, or means that an adult's needs are safely managed.

- 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 Kent Support Levels Guidance which follow the principle of 'Right Help, Right Time, Right Professional'
  - 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
- All staff will be made aware of the process for identifying, assessing and responding to children's needs in line with the Kent Support Levels Guidance. This includes understanding the criteria, including the level of need, for when children and families may be supported through
  - universal services and community-based Early Help
  - the targeted early help level of Family Help, under sections 10 and 11 of the Children Act 2004
  - statutory services under section 17 of the Children Act 1989, including children in need and disabled children
  - statutory child protection processes under section 47 of the Children Act 1989, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm
  - care and supervision proceedings under section 31 of the Children Act 1989
  - accommodation under section 20 of the Children Act 1989.

- Staff are not expected to make threshold decisions alone. If staff are concerned about a child's welfare or safety or are unsure what level of support may be required, they will speak to the DSL in line with this policy. The DSL will consider the concern in line with the Kent Support Levels Guidance, KSCMP procedures and local referral pathways.

- Where safeguarding concerns are identified, options may include:
    - managing support for the child internally through [school/college] pastoral, welfare and/or safeguarding support processes, where this is appropriate and does not place the child at additional risk.
    - considering whether parents/carers should be informed to further support the child's wellbeing, where it is safe and appropriate to do so.
    - accessing universal services and community-based Early Help for *children with emerging needs*, including support available through Kent Family Hubs, the [school/college] and other local universal, voluntary or community services.
    - making a Request for Support to the Front Door Service via the Kent Children's Services Portal where a child's needs cannot be met by universal or community-based early help support alone and coordinated, multi-disciplinary support may be required, or where there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm.

- Community-based Early Help is support for children of all ages that improves a family's resilience, improves outcomes or reduces the chance of a problem getting worse. It is not a single service, but a system of support delivered by local authorities and their partners, including education providers. The Kent Support Levels Guidance describes this as '*children with emerging needs (Level 2)*'.
    - Children at this level are usually best supported by professionals who already work with them, such as health professionals, early years settings, schools or colleges, and/or through community resources such as Family Hubs or voluntary services.
    - A Request for Support via Front Door Service is not required for support at this level.
    - Where community-based Early Help is appropriate, the DSL will consider what support can be provided within school and/or through local universal, voluntary or community services, including Kent Family Hubs.
    - Where the need of a child/family escalate, become persistent, or cannot be met by universal or community-based Early Help alone, the DSL will consider whether a Request for Support to Family Help is required in line with the Kent Support Levels Guidance.

- Where children and families have multiple and/or complex needs, or persistent needs, which cannot be met by universal or community-based early help support alone, they may require coordinated, multi-disciplinary support to prevent escalation through the targeted early help level of Family Help. The Kent Support Levels Guidance describes this as '*Family Help – Children with multiple and/or complex needs (Level 3)'*. Support at this level may include targeted early help and statutory support under section 17 of the Children Act 1989, where required to safeguard and promote the child's welfare.
    - A Request for Support is required and will be made to the Front Door Service via the Kent Children's Services Portal.

- Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and needs and risks cannot be safely managed through targeted or Child in Need Family Help support alone, a statutory child protection response is required. The Kent Support Levels Guidance describes this as '*Family Help – Children in need of protection (Level 4)'*.
    - Safeguarding activity at this level is led under section 47 of the Children Act 1989.
    - A Request for Support is required and will be made to the Front Door Service via the Kent Children's Services Portal.
    - If a child is at immediate risk, the Request for Support will be marked as "urgent".
    - If the child is in immediate danger, emergency services will be contacted using 999

- Kent College Pembury will take appropriate safeguarding action in response to concerns but will not investigate child protection concerns as a single agency or attempt to determine whether abuse, neglect or exploitation has occurred. Staff will record and report concerns in line with this policy and KSCMP procedures, and information will be shared with Children's Front Door and/or the police where appropriate, so that concerns can be considered through the appropriate multi-agency process
- Kent College Pembury recognises that children may be harmed in contexts outside the home, including within peer groups, the wider community and online. When making a Request for Support, the school will provide as much relevant information as possible so that any assessment can consider the full context of the child's lived experience and take a contextual approach to harm.
- If the school believes a child may need support but is unclear whether a Request for Support should be submitted, the DSL may seek advice through a no-name consultation with the Front Door Service before deciding next steps. A consultation will not be used where a child is suffering, or is likely to suffer, significant harm; in these circumstances, a Request for Support will be submitted without delay.
- The DSL will usually have responsibility for making Requests for Support and other safeguarding referrals. However, all staff are made aware of the local Kent process for making referrals to the Front Door and for statutory assessments under the Children Act 1989, including the role they may be expected to play in such assessments.
- If staff have any concerns about a child's welfare or safety, they are expected to act on them immediately.
    - If staff are unsure whether something is a safeguarding issue, they will speak to a DSL.
    - If, in exceptional circumstances, a DSL or deputy DSL is not available, this must not delay appropriate action being taken. In these circumstances, staff should speak to a member of the school senior leadership team, seek a consultation from the Front Door Service, contact the police where urgent action is required, or make a Request for Support themselves. Contact information is available in the safeguarding flowchart in this policy.
    - Any safeguarding action taken by staff must be shared with the DSL as soon as possible.
- Parents/carers will usually be spoken to where a Request for Support is being considered, and their agreement to engage will be sought where this is required and safe/appropriate to do so. This will be considered in line with KSCMP procedures and the Kent Support Levels Guidance.
    - Parent/carer agreement to engage is not required for *'Family Help – Children in need of protection (Level 4)'*, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. A Request for Support must be made in these circumstances; however, it is good practice for the school to work openly and transparently with parents/carers and inform them of the Request for Support where it is safe to do so.
    - Parents/carers will not be informed before a Request for Support is made where this may place a child at increased risk of harm, place an adult at risk of serious harm, prejudice the prevention or detection of serious crime, or undermine a criminal investigation.

- If, after a Request for Support or other external intervention, a child's situation does not appear to be improving, or there are concerns about a decision or response, staff or the DSL will consider whether to re-refer and/or follow the Kent Safeguarding Children Escalation Procedure to ensure concerns are addressed and, most importantly, that the child's situation improves.

- Any pastoral or welfare support provided by the school to children and families will be recorded and reviewed. The DSL will oversee support where families are requiring additional support, to ensure that school activity does not obscure potential safeguarding concerns from the wider professional network.

- 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.

- Where a child is supported through community-based Early Help, Family Help, child in need, child protection or care planning processes, we will work with partner agencies to promote joined-up planning, avoid unnecessary duplication and ensure the child's educational needs, safety, voice and lived experience are considered.

- 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).

- When making a Request for Support or contributing to statutory assessment we will provide relevant information about the child's presentation, attendance, progress, relationships, family circumstances, wider context and any known risks outside the home, including online, peer group or community-based concerns.

- 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.

- Where possible and appropriate, staff will be open and transparent with children and families about what information may be shared, with whom and why. However, information may be shared without agreement where this is necessary to safeguard a child, promote a child's welfare, prevent delay or avoid increasing risk.

- 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

- 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 recognises that children may be vulnerable to a wide range of safeguarding issues, both inside and outside the home, including online. Staff will maintain an attitude of 'it could happen here' and will report any concerns to the DSL in line with part 3 of this policy

- 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 (including harassment and violence)

- 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.
- All members of staff at Kent College Pembury recognise that children can abuse other children; this is known as child-on-child abuse and may take place online, face-to-face, physically, verbally or through a combination of channels.
- Even if there are no reported cases of child-on-child abuse, staff will remain alert to the possibility that it may be taking place and not being reported
- 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"; this can lead to a culture of unacceptable behaviours, misogyny/misandry, and can 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 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 , sometimes known as 'teenage relationship abuse'.
    - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm including where there is an online element which facilitates, threatens and/or encourages physical abuse
    - serious physical assault and harm, or the threat of harm with a weapon
    - sexual violence such as rape, assault by penetration and sexual assault, including where there is an online element which facilitates, threatens and/or encourages sexual violence.
    - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
    - 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
    - Consensual and non-consensual making or sharing of nudes and semi-nudes (previously known as sexting or youth produced sexual imagery), including where generated by Artificial Intelligence (AI)
    - 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 which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- Kent College Pembury recognises that harmful sexual behaviour exists on a continuum, from developmentally inappropriate or problematic sexual behaviour through to abusive behaviour and sexual violence.

- Concerns will be considered in context, taking account of the age and stage of development of the children involved, any power imbalance, coercion, threats, exploitation, the nature of the behaviour, the impact on those affected, and any wider safeguarding risks.
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE.

- All staff have a role to play in challenging inappropriate, harmful or abusive behaviours between children. Staff will be alert to factors which may increase risk or affect how children experience or report abuse, including age, developmental stage, sex, ability, SEND, culture, ethnicity, sexual orientation, gender identity, power imbalance, peer group dynamics and wider contextual factors. Staff will be aware of the possibility that children may minimise, normalise or not recognise harmful behaviours, and that some behaviours may be facilitated, threatened, encouraged or shared online

- 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.

- Kent College Pembury recognises that for some (but not all) forms of child-on-child abuse, girls are more likely to be victims and boys are more likely to be perpetrators. However, all child-on-child abuse is unacceptable, will be taken seriously and will be responded to in line with this policy.

- Kent College Pembury recognises that the law is in place to protect children rather than unnecessarily criminalise them. Where relevant, this will be explained to students in an age and developmentally appropriate way which avoids alarming or distressing them, while making clear that harmful, abusive or non-consensual behaviour is unacceptable and will be taken seriously.

- Kent College Pembury want children to feel confident to report abuse, knowing that their concerns will be treated seriously and that they will be supported and kept safe. The school will ensure reporting systems are well promoted, easily understood and easily accessible. Children who report child-on-child abuse will be reassured that they are not creating a problem and will not be made to feel ashamed for sharing a concern.

- Kent College Pembury recognises that child-on-child abuse is a safeguarding issue for all children involved. We will consider the safety, welfare and support needs of the child who has experienced harm, any other affected children, and the child alleged to have caused harm.

- Any concerns or allegations relating to child-on-child abuse, whether on-site, off-site or online, will be recorded and reported to the DSL in line with this policy.
    - The DSL will consider the concern in line with relevant school policies and procedures, including behaviour, anti-bullying and child protection procedures.
    - The DSL will consider the behaviour in context, including the child's age and stage of development, any SEND or communication needs, trauma or abuse history, power imbalance, coercion, intent, frequency, escalation and the impact on others.
    - Concerns will be responded to, and where appropriate investigated under relevant school procedures, while recognising the need to engage with multi-agency processes where safeguarding or child protection concerns are identified.
    - Where concerns involve harmful sexual behaviour, sexual harassment or sexual violence, DSLs will respond in line with Part five of KCSIE.
    - Responses will always be child-centred, proportionate and based on the circumstances of the case.

- When a concern of child-on-child abuse is reported, a DSL will consider whether an immediate risk and needs assessment is required. Members of the DSL team have completed AIM training and will use the AIM assessment tool if harmful sexual behaviour has been displayed. This will be considered on a case-by-case basis and may include:
    - the wishes and feelings of the child who has been harmed
    - the nature of the concern or alleged incident
    - whether a crime may have been committed
    - whether harmful sexual behaviour may have been displayed
    - the ages and developmental stages of the children involved
    - any power imbalance, coercion, intimidation or exploitation
    - whether the concern appears to be a one-off incident or part of a pattern of behaviour
    - any vulnerability, SEND or additional needs affecting the children involved
    - any online elements or wider contextual factors
    - any ongoing risks to the child who has been harmed, other children, staff or the wider school community
    - whether the concern links to other safeguarding issues, such as child sexual exploitation, child criminal exploitation, serious violence or abuse within intimate personal relationships between children.

- The risk and needs assessment, where completed, will be recorded and kept under review. Actions will be taken to protect and support all children involved and to address any wider safeguarding risks within the school environment.

- The school will take appropriate safeguarding, pastoral and/or behaviour-related action in response to child-on-child abuse. However, where the concern indicates that a child may require Family Help, statutory support or protection, a DSL will make a Request for Support via the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and KSCMP procedures.

- The school will normally inform parents/carers of the children involved in child-on-child abuse, unless doing so would place a child at risk of harm, place another person at risk, prejudice the prevention or detection of crime, or undermine a police or statutory safeguarding response.
    - Information shared with parents/carers will be relevant to their own child and shared in line with safeguarding, confidentiality and data protection requirements. The school will not share confidential information about other children, including any safeguarding action, support or sanctions, unless there is a lawful and appropriate basis to do so.

- Child-on-child abuse is preventable. Timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. The school will work to minimise the risk of child-on-child abuse by creating a safe culture, promoting respectful relationships, providing appropriate curriculum opportunities, ensuring children know

how to report concerns, and responding consistently to harmful behaviour.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

- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by the pastoral and leadership teams.

- 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.

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

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

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 will all age groups, not just older pupils.

- For the purpose of this policy, nudes and semi-nudes means nude or semi-nude images, videos or livestreams of children under the age of 18. This includes imagery that is taken/created by a child, taken/created by a child and shared by another person, digitally altered, or generated using artificial intelligence (AI). Nudes and semi-nudes may be shared online, between devices, through social media, messaging apps, gaming platforms, forums, livestreams or other digital routes.

- Creating, possessing or sharing nudes and semi-nudes of children under 18, including where this has happened with consent, is illegal and can present complex safeguarding issues. However, [Name of school/college] recognises that the law is in place to protect children rather than unnecessarily criminalise them. Responses will therefore be child-centred, proportionate and focused on safeguarding and supporting the children involved.

- Kent College Pembury recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos be a safeguarding issue; all concerns will be reported to and dealt with by the DSL in line with this policy, the Kent and Medway Responding to Nude and Semi-Nude Image Sharing Guidance, the Kent Support Levels Guidance and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance.

- 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.

When made aware of a concern involving making or sharing of nudes and semi-nudes, the DSL will hold an initial review meeting in line with the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may include speaking with relevant staff and children, involving parents/carers where safe and appropriate, seeking advice, making a Request for Support via the Kent Children's Services Portal, and/or contacting the police where required.

- Parents/carers of children involved in making or sharing nudes or semi-nudes, will be informed at an early stage, unless there is good reason to believe that involving them would put a child at risk of harm.

- A Request for Support will be made to the Front Door Service via the Kent Children's Services Portal, and/or the police informed immediately if:
  - the incident involves an adult (over 18).
  - there is reason to believe that a child has been coerced, blackmailed, groomed or exploited.
  - there are concerns about a child's capacity to consent, including due to age, developmental stage, vulnerability or additional needs
  - the imagery involves sexual acts, violence, threats, exploitation or other high-risk features (for example, a child under the age of thirteen, or images depict sexual acts which are unusual for the child's developmental stage)
  - a child is at immediate risk of harm
  - there are wider safeguarding concerns, including links to child sexual exploitation, child criminal exploitation, harmful sexual behaviour or abuse within intimate personal relationships between children.

- All decisions and action taken regarding nude or semi-nudes will be responded to and recorded in line with our child protection procedures.

- The DSL may choose to involve other agencies where there are concerns about nudes or semi-nudes at any time, including if further information is disclosed at a later date or there are additional concerns or incidents.

- If the DSL is unsure if a Request for Support is appropriate, advice will be sought from the Front Door Service.

5.3 Exploitation, including child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, serious violence and modern slavery

- Kent College Pembury recognises that Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines, serious violence and modern slavery are safeguarding issues and may overlap. Children may also experience exploitation alongside other forms of abuse, neglect or harm. We will therefore need to consider the full context of the child's lived experience, including risks outside the home, peer groups, community locations, transport routes and online environments.

- Kent College Pembury recognises that CSE and CCE are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. This may involve an exchange for something the child needs or wants, and/or be for the financial advantage or increased status of the perpetrator or facilitator, and/or involve violence or the threat of violence.
- Kent College Pembury recognises that exploitation may be committed or facilitated by individuals, organised networks or gangs, and the child may identify as being part of the group that is exploiting them. Exploitation can affect children of any age and sex, and it is not possible for a child to consent to being exploited, abused or trafficked.
- Children may not recognise that exploitation is happening to them and may be manipulated, groomed or coerced into situations they do not fully understand. Children who are exploited may also be coerced, controlled, threatened or manipulated into activity which appears to be offending behaviour, and the school will consider whether such behaviour may be linked to exploitation before responding.
- Kent College Pembury recognises that:
    - **Child Sexual Exploitation** (CSE) is a form of child sexual abuse. CSE can be a one-off occurrence or a series of incidents over time and may range from opportunistic to complex organised abuse. CSE can affect any child who has been coerced into sexual activity, including 16- and 17-year-olds who can legally consent to sexual activity. Some children may believe they are in a genuine romantic relationship and may not recognise that they are being exploited.
    - **Child Criminal Exploitation** (CCE) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime, threatening or committing serious violence, or carrying weapons. Children can become trapped in criminal exploitation through threats, violence, intimidation, debt bondage, grooming or coercion, including threats towards their families. The experience of girls who are criminally exploited can be different from that of boys, and indicators may not be the same. Girls are also at risk of criminal exploitation. Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation.
    - **County lines** is a form of criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other forms of "deal line" to export illegal drugs. This activity can happen locally as well as across the UK; no specific distance of travel is required. Children may be exploited to move, store or sell drugs or money and may be controlled through coercion, intimidation, violence, threats, debt bondage, online activity or exploitation of their family circumstances.
    - **Serious violence** includes violence and exploitation involving weapons, gangs, criminal networks or serious physical harm. It can involve carrying, threatening with, or using knives or other weapons, or concerns that a child may be exposed to weapons through peers, gangs, criminal networks or community-based harm. The likelihood of involvement in serious violence may be increased by factors such as being male, having been suspended, spent time in alternative provision or been permanently excluded, having experienced child maltreatment, having been involved in offending, having used drugs or alcohol in early adolescence, or having previously been a victim or displayed violence. Serious violence can often peak in the hours just before or after school/college, including when children are travelling to and from the setting, and may be concentrated in particular places.
    - **Modern slavery** includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, criminal exploitation, forced criminality, forced labour, domestic servitude and the removal of organs.

- Staff will be alert to indicators that a child may be at risk of, or experiencing, exploitation, county lines or serious violence. These may include:
    - unexplained gifts, money or new possessions
    - increased absence from school/college or regularly missing education
    - going missing from home or care, or regularly returning home late
    - changes in friendship groups or relationships with older individuals or group
    - a significant decline in educational performance
    - signs of assault, unexplained injuries, self-harm or changes in wellbeing

- drug or alcohol misuse
- association with others involved in exploitation, gangs or criminal networks
- receiving requests for drugs via a phone line, moving drugs or collecting money
- being found in accommodation with which they have no connection, sometimes referred to as a trap house, cuckooing address or hotel room linked to drug activity
- owing money or a "debt bond" to exploiters
- having their bank account used to facilitate criminal activity
- being vulnerable to grooming, coercion, threats, intimidation or online exploitation.

- The school will seek to understand when and where children may feel unsafe, including by listening to children, consulting staff and working with partners to understand the local context and support a coordinated safeguarding response.

- Kent College Pembury recognises that children who have been exploited may need additional support to help keep them safe and engaged in education.

- If staff are concerned that a child may be at risk of, or experiencing, child sexual exploitation, child criminal exploitation, county lines, serious violence, trafficking or modern slavery, they will report their concerns to the DSL without delay.

- The DSL will consider concerns about exploitation in line with this policy and relevant local and national guidance and make referrals or reports as appropriate.
  - The DSL will consider use of the Kent and Medway Child Exploitation Identification Tool where there are concerns that a child may be experiencing, or be vulnerable to, exploitation.
  - Where broader intelligence is known about potential exploitation or other community safety concerns, the DSL will consider whether information should be shared with Kent Police through the Community Partnership Intelligence Portal.
  - Where modern slavery or trafficking is suspected, relevant safeguarding and/or child protection procedures will be followed, and the DSL will consider whether a referral through the National Referral Mechanism is required.
  - Any safeguarding concerns for children will be referred to the Front Door Service and/or police as appropriate. If there is a crime in progress or immediate risk, emergency services will be contacted using 999.

- When sharing information or making a Request for Support to the Front Door Service or other appropriate agencies, Kent College Pembury will provide as much relevant information as possible to support a contextual safeguarding response. This may include information about the child's presentation, attendance, peer relationships, online activity, family circumstances, community risks, known locations of concern, transport routes, patterns of absence, and any indicators of exploitation, trafficking, modern slavery or serious violence.

5.4 Honour or Faith-Based Abuse (HBA)

- Kent College Pembury recognises that honour or faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community. This can include female genital mutilation, 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. Staff will be alert to this dynamic and the additional risks it may create when deciding what safeguarding action is required.

- All forms of HBA are abuse, regardless of the motivation, and will be handled and escalated as such. If staff have any concerns that a child may be at risk of, or has experienced, honour or faith-based abuse, they will speak to the DSL without delay. The DSL will consider concerns in line with this policy, KSCMP procedures, the Kent Support Levels

Guidance and any relevant national or local guidance. If there is an immediate threat or danger, the police will be contacted.

- Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.
    - All staff will speak to the DSL if they have any concerns that a child may be at risk of FGM or may have experienced FGM.
    - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to directly report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.
    - It will be rare to see visual evidence of FGM, and staff must not examine [pupils/students]. Unless the teacher has good reason not to, they should also discuss the concern with the DSL. The mandatory reporting duty does not apply to suspected or at-risk cases where FGM has not been discovered; in these cases, staff must follow local safeguarding procedures and speak to the DSL.
- Forced marriage is a crime.
    - A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or another form of coercion is used. Coercion may be physical, emotional or psychological. A lack of full and free consent can also arise where a person cannot consent, for example due to learning disabilities.
    - It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even where violence, threats or another form of coercion are not used. This applies to non-binding, unofficial "marriages" as well as legal marriages.
    - Staff will report any concerns about forced marriage to the DSL. Advice can also be sought from the Forced Marriage Unit: 020 7008 0151 or fmu@fcdo.gov.uk

5.5 Preventing Radicalisation

- Kent College Pembury recognises that children may be susceptible to radicalisation into terrorism. Protecting children from this risk forms part of the [school/college]'s wider safeguarding approach.
- Kent College Pembury is aware of its duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This is known as the Prevent duty.
- For the purposes of this policy:
    - **extremism** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
    - **radicalisation** is the process of a person legitimising support for, or use of, terrorist violence
    - **terrorism** is an action that endangers or causes serious violence to people, causes serious damage to property, or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- Kent College Pembury recognises that there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. As with other safeguarding risks, staff will be alert to changes in behaviour, presentation, language, relationships or online activity which may indicate that they are in need of help or protection.
- Staff will use their professional judgement and act proportionately where they have concerns that a child may be susceptible to radicalisation. Any concerns will be reported to the DSL in line with this policy.
- The DSL and senior leaders will be familiar with the Prevent duty guidance and local procedures for making a Prevent referral. The school's approach to Prevent will be considered as part of wider safeguarding arrangements and will include appropriate attention to:

- leadership and partnership
- staff capability, training and awareness
- reducing permissive environments, including online environments, external speakers, visitors, use of premises and access to extremist or terrorist content.

- Kent College Pembury will ensure that staff receive appropriate Prevent training so they understand the Prevent duty, can recognise concerns, know how to report them internally, and understand the local Prevent referral process.
  - The DSL will receive in-depth training to enable them to support staff on Prevent matters and provide updates on relevant issues.
- Where the DSL considers that a Prevent referral may be appropriate, this will be managed in line with local Kent Prevent procedures, the Kent Support Levels Guidance and relevant national guidance. The DSL may seek advice from the Kent and Medway Prevent Team where appropriate. If there is an immediate threat to safety, emergency services will be contacted using 999.
- Prevent referrals are assessed by police and may be passed on to a multi-agency Channel panel to consider whether support is required. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. A representative from Kent College Pembury may be asked to attend a Channel panel to support assessment and planning.
- Where a child is receiving support through Prevent or Channel and moves to a new setting, the DSL will share relevant information with the DSL at the new setting in advance of the child leaving, so that support can continue when the child arrives

5.6 Cybercrime

- Kent College Pembury recognises that cybercrime is criminal activity committed using computers and/or the internet. Cybercrime is broadly categorised as either cyber-enabled or cyber-dependent.
  - **Cyber-enabled crime** refers to crimes that can happen offline but are enabled at scale and speed online, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online harassment or other technology-assisted harm.
  - **Cyber-dependent crime** refers to crimes that can only be committed using a computer, computer network or internet-enabled device. This may include unauthorised access to computers, sometimes referred to as hacking, denial of service attacks or "booting", and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets or Remote Access Trojans.
- Kent College Pembury recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately become involved in cyber-dependent crime, sometimes without understanding the legal, ethical or safeguarding implications.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent crime, they will report their concerns to the DSL. The DSL will consider the concern in line with this policy, the Kent Support Levels Guidance and any relevant local or national guidance.
- Where appropriate, the DSL may consider accessing local support and/or referring to the Cyber Choices programme.
- Cyber Choices is focused on cyber-dependent crime. Concerns about cyber-enabled crime, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online bullying or other online safety concerns, will be responded to in line with this policy and relevant [school/college] safeguarding, behaviour, acceptable use and online safety arrangements.
- If the concern indicates that a child may require Family Help, statutory support or protection, the DSL will consider whether a Request for Support should be made via the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and KSCMP procedures. If a child is in immediate danger, emergency services will be contacted using 999.

5.7 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. Domestic abuse can include, but is not limited to, psychological, physical,

sexual, financial/economic or emotional abuse, including coercive and controlling behaviour. Domestic abuse can take place inside or outside the home and within different types of relationships, including intimate partner relationships, ex-partners and family members. Types of domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent or caregiver abuse.

- Kent College Pembury recognises that anyone can be a victim of domestic abuse, regardless of sex, age, ethnicity, socio-economic status, sexuality, background or identity.
- Kent College Pembury recognises children can be victims of domestic abuse in their own right if they see, hear or experience the effects of abuse. Children may also experience domestic abuse within their own intimate relationships, sometimes referred to as teenage relationship abuse. Where one or both children are under 16, this may not fall within the statutory definition of domestic abuse, but it will still be responded to as a safeguarding concern.
- We recognise that domestic abuse can have a detrimental and long-term impact on children's health, wellbeing, development and ability to learn.
- We recognise that domestic abuse may occur, continue or escalate following separation. Concerns will not be viewed in isolation, and the school will consider the child's lived experience, family circumstances and any wider safeguarding risks.
- Staff will respond to domestic abuse concerns in a trauma-informed way and will avoid victim-blaming language or assumptions.
- If staff are concerned that a child may be seeing, hearing or experiencing the effects of domestic abuse, or experiencing abuse within their own intimate relationship, they will report their concerns to the DSL.
- The DSL will consider concerns about domestic abuse in line with this policy, KSCMP procedures, the Kent Support Levels Guidance and any relevant local or national guidance. Where the concern indicates a need for Family Help, statutory support or protection, the DSL will consider whether a Request for Support should be made via the Kent Children's Services Portal. If a child or adult is in immediate danger, emergency services will be contacted using 999.
- Kent College Pembury participates in Operation Encompass. Operation Encompass is an information-sharing scheme between the police and education settings which supports schools/colleges to provide timely, informed support to children affected by domestic abuse. Police forces in England have a duty to notify a child's school where they have attended a domestic abuse incident and have reasonable grounds to believe a child may be a victim of domestic abuse. This includes children connected to the household regardless of whether they were present at the incident.
- Operation Encompass notifications will help the school to have up-to-date and relevant information about a child's circumstances so that appropriate support can be considered according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures, and where there are concerns about a child's welfare, the DSL will consider whether a Request for Support is required in line with the Kent Support Levels Guidance.
- Operation Encompass notifications will be handled confidentially, stored securely and managed in line with data protection requirements and the school's child protection recording procedures. The DSL will have oversight of notifications and will ensure that relevant information is shared with staff on a need-to-know basis to safeguard and support the child.
- Where we are unsure how to respond to an Operation Encompass notification, advice may be sought from the Front Door Service or from the Operation Encompass advice and helpline service: 0204 513 9990.

5.8 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.

- Kent College Pembury will support children to develop age-appropriate personal safety awareness through the curriculum and wider safeguarding education. This will focus on building children's confidence, judgement and ability to seek help, rather than simply warning them about strangers.

5.9 Children and the Court System, including children affected by parental separation, court orders or family disputes

- Kent College Pembury recognises that children may be affected by the court system in different ways, including where they are required to give evidence in criminal proceedings or where they are affected by private or public family law proceedings, child arrangements or parental disputes.
- Where staff are aware that a child is involved in, or affected by, court proceedings, they will share relevant information with the DSL so that appropriate support can be considered. This may include pastoral support, adjustments within Kent College Pembury liaison with parents/carers where appropriate, and working with partner agencies where this is needed to safeguard and promote the child's welfare.
- Kent College Pembury recognises that parental separation, child arrangements and family court processes can be stressful for children and may contribute to conflict, anxiety or safeguarding concerns. The welfare and best interests of the child will remain central to the school's decision-making.
- Where parents/carers disagree about arrangements, decisions or the exercise of parental responsibility, the school will act in line with statutory guidance, relevant court orders, education law, safeguarding duties and data protection requirements. Where necessary, parents/carers may be advised to seek independent legal advice or resolve disputes through the appropriate legal route.
- Kent College Pembury will consider any court orders or legal restrictions that are shared with the setting and relevant to the child's education, welfare or safety. Parents/carers may be asked to provide the most recent court order where this is appropriate and/or necessary to help the school understand arrangements or restrictions.
- Staff will remain alert to any safeguarding concerns arising from parental disputes, child arrangements or court proceedings. Concerns will be reported to the DSL and responded to in line with this policy

5.10 Children with family members in prison or affected by parental offending

- Kent College Pembury recognises that children with family members in prison, or who are otherwise affected by parental offending, may experience additional emotional, practical and safeguarding needs. This may include stigma, isolation, poverty, poor mental health, disrupted family relationships, attendance concerns or changes in behaviour.

6. Staff will share any concerns with the DSL so that appropriate support can be considered. This may include pastoral support, safe adult support, signposting to specialist services, liaison with parents/carers where appropriate, and consideration of early help or wider multi-agency support.

7. Kent College Pembury will respond to children affected by parental imprisonment or offending in a sensitive and trauma-informed way, recognising the potential impact on the child's safety, wellbeing, attendance, learning and relationships.

7.1 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.

8. Supporting Children Potentially at Greater Risk of Harm

- Kent College Pembury recognises that some children may be more vulnerable to abuse, neglect, exploitation or harm, or may face additional barriers to recognising, reporting or being supported with safeguarding concerns. Staff will be alert to the needs and experiences of these children and will ensure concerns are reported to the DSL in line with this policy.

- The school will take a child-centred, trauma-informed and contextual approach, considering the child's voice, lived experience, individual circumstances and any barriers they may face in accessing help or support.

  - 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 disproportionally 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

8.1 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 both online and offline.
- Kent College Pembury recognises that children with special educational needs or disabilities (SEND), can face additional safeguarding challenges both online and offline.
- Kent College Pembury recognises that additional barriers can exist when recognising abuse, neglect and exploitation for these children. These may include:
    - assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's SEND without further exploration.
    - children being more prone to peer group isolation or bullying, including prejudice-based bullying
    - the potential for children with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
    - communication barriers and difficulties in managing or reporting concerns.
    - children not understanding that what is happening to them is abuse, neglect or exploitation.
    - the need for intimate or personal care, or children being isolated from others.

    - children being more dependent on adults for care and support.
    - difficulties with cognitive understanding.
- Staff will appropriately explore potential indicators of abuse, neglect and exploitation and will not assume that these are related to a child's SEND. Concerns will be reported to the DSL in line with this policy.
- Kent College Pembury will support children with SEND to communicate, be listened to and have their voice heard and acted upon. Staff will consider whether reasonable adjustments, communication aids, trusted adults or other support may be needed to help children share concerns.
- Any report or concern involving a child with SEND will require close liaison between the DSL and the SENCO with oversight for SEND: Mrs Helena Levett where appropriate.
- Kent College Pembury will consider whether extra pastoral support, communication support or other adjustments are required to safeguard and promote the welfare of children with SEND.
- Kent College Pembury has intimate and/or personal care arrangements which promote children's health, safety, independence and welfare, while respecting their dignity and privacy. Arrangements for intimate and personal care will be open, transparent and appropriately recorded. Further information can be found in or policies

8.2 Children Requiring Mental Health Support

- Kent College Pembury has an important role to play in supporting the mental health and wellbeing of our pupils. We recognise that mental health problems can, in some cases, develop into safeguarding concerns, including where there are concerns about self-harm, eating disorders, suicidal ideation or risk of suicide. 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.
-
- 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.

- Only appropriately trained professionals should diagnose a mental health problem. However, recognises our staff are well placed to observe children day-to-day and identify those whose behaviour, presentation or circumstances suggest that they may be experiencing a mental health problem or be at risk of developing one.
    - Staff will be alert to potential warning signs that a child may be struggling with their mental health. These may include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually enjoy, physical signs of self-harm, neglecting themselves, suicidal ideation, changes in attendance, engagement, relationships or emotional wellbeing.
    - Not every child who displays these behaviours will have a mental health concern. However, staff will remain professionally curious and will record and report any concerns so children can receive appropriate support and early intervention.

- If staff have a concern about a child's mental health or wellbeing, they will follow the school processes for recording and reporting concerns to the DSL and Mental Health Lead, Olivia Cottrell (School Nurse and DDSL)

- If a mental health concern is also a safeguarding concern, staff will speak to the DSL in line with this policy. The DSL will consider whether the child may benefit from support through universal services or community-based early help, or whether a Request for Support is required.

- Where mental health support is needed, parents/carers will be informed to support the child's wellbeing, unless doing so would place the child at additional risk.

- If staff believe that a child is in immediate danger, emergency services will be contacted using 999 or arrangements will be made for the child to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs urgent help for their mental health but it is not an emergency, help will be sought through NHS 111.

- We will consider the range of locally available support to meet children's mental health and wellbeing needs. This may include internal pastoral support, the senior mental health lead, Mental Health Support Teams, school nursing, early help/Family Help, NHS services, early support hubs, young futures hubs, voluntary sector support and specialist services.

- Kent College Pembury will ensure that any mental health support or intervention offered is appropriate to the child's needs, age and phase of education, and is evidenced as safe and effective.

- Kent College Pembury will support children's mental health and wellbeing by:
    - promoting positive mental wellbeing and resilience.
    - Observing students and identifying early those who may be experiencing mental health problems or be at risk of developing them.
    - ensuring early targeted support is considered and provided where appropriate.
    - liaising with and/or referring to specialist services where needed.

- Age and ability appropriate education will be provided to students to help promote positive mental health, wellbeing and resilience.
    - This will be delivered through PSHE, RSHE, pastoral provision, assemblies, targeted interventions, mental health awareness activities and wider whole school wellbeing work.

8.3 Children who are absent from education

- In line with the Working Together to Improve School Attendance and Children Missing Education statutory guidance, Kent College Pembury recognises that 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.
- Staff will be alert to patterns of absence, persistent absence, severe absence, repeated absence, unexplained absence and children missing from education. Where absence raises a welfare or safeguarding concern, staff will report this to the DSL in line with this policy.
- The DSL will consider whether absence may be linked to wider safeguarding risks within the family or community, including abuse, neglect, exploitation, mental health concerns, domestic abuse, forced marriage, FGM, trafficking, serious violence, county lines, online harm or other extra-familial harm.
- Where possible, Kent College Pembury will hold more than one emergency contact number for each student so there are additional options to contact a responsible adult where a child who is absent from education is also identified as a welfare or safeguarding concern.
    - Kent College Pembury will seek to hold emergency contact information for both parents where appropriate, unless doing so would place a child at risk of harm or be contrary to a court order or other legal restriction.
    - Where contact with a parent or other adult is restricted or unsafe, this will be clearly recorded in line with school safeguarding and record keeping procedures.
    - Kent College Pembury will be proactive in understanding children's significant relationships and lived experiences, including the role of fathers, non-resident parents and other adults who may be important in the child's life, where this is appropriate and safe.

- Kent College Pembury recognises that a child may be considered missing from education at any stage where their whereabouts, education provision or safety cannot be established.
- Where we have concerns that a child has unexplained, persistent, repeated or prolonged absence, or may be missing from education, action will be taken in line with statutory duties and local procedures. This may include working with parents/carers, Kent PRU and Attendance Service (KPAS), the local authority CME team, the Front Door Service and/or other agencies as appropriate.

- Where there are concerns that a child may be missing from education, including where the school becomes aware that a child has moved out of area or their whereabouts are unknown, the school will make a referral to KPAS promptly so that appropriate checks can be undertaken. The school will not delay referral while completing local enquiries where this may prevent timely action by the local authority.
- Where there are concerns that a child may be missing from education or where their absence raises welfare or safeguarding concerns, the DSL will make a Request for Support as appropriate.

Kent College Pembury will provide information to the local authority where required when a child is removed from roll, including at standard and non-standard transition points, in line with Children missing education statutory guidance and local procedures

8.4 Elective Home Education

- Kent College Pembury recognises that many home educated children have a positive learning experience, and that parents/carers may choose elective home education with their child's best education at the heart of the decision. Kent College Pembury also recognises that elective home education can mean some children are not in receipt of suitable education and may become less visible to the services that are there to keep them safe and supported.
- 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.
- Kent College Pembury will consider local guidance and tools, including the KSCMP EHE Leavers Checklist, to support proportionate safeguarding checks, information sharing and decision-making before a child is removed from roll. This will include considering the child's lived experience, any existing safeguarding or welfare concerns, parental responsibility arrangements, SEND or EHCP needs, young carer status, attendance, and whether further advice or a Request for Support is required.
- Where there are safeguarding or welfare concerns, the DSL will consider whether a Request for Support is required.

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

- Kent College Pembury recognises that children may need a social worker due to safeguarding or welfare needs, including abuse, neglect, exploitation or complex family circumstances.
- 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. This may include responding to unauthorised absence, children absent from or missing education, behaviour, pastoral support, academic support and any wider safeguarding risks within the family or community.

- 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.

8.6 Looked after children, children in kinship care, 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 will work 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.

8.7 **Young carers**

- Kent College Pembury recognises that young carers may have caring responsibilities for a family member with a long-term illness, disability, mental health need, substance misuse issue or other care need.
- Kent College Pembury will be alert to the needs of young carers, recognising that caring responsibilities can impact on a child's attendance, attainment, behaviour, emotional wellbeing, relationships and ability to participate fully in school life.
- Early identification is important to ensure young carers receive support at the right time and from the appropriate services. Staff will remain alert to indicators that a child may be a young carer, including changes in attendance, punctuality, concentration, tiredness, homework completion, emotional wellbeing, social relationships or increased responsibilities at home. If staff are concerned that a child may be a young carer, or that caring responsibilities may be affecting their safety, welfare or wellbeing, they will report this to the DSL.
- The DSL will consider what support may be required, including pastoral support within school, reasonable adjustments, support with attendance or learning, and whether advice or support should be sought from external partners, local authority services, health services or young carers services.
- Where caring responsibilities appear to be inappropriate, excessive, unsafe, or are having a significant impact on the child's welfare, the DSL will consider whether a Request for Support should be made.

- Support for young carers is currently available through:
  - Imago Young Carers, who provide information, advice, signposting and support for young carers, families and professionals.

8.8 Children who are Lesbian, Gay, or Bisexual

- The fact that a child or a young person may be LGB is not in itself an inherent risk factor for harm, however, the school recognises that children who are LGB or are perceived by other children to be LGB (whether they are or not) can be targeted by other children or others within the wider community.
- Kent College Pembury will take steps to prevent and respond to discriminatory bullying, prejudice and harmful behaviour, including through our safeguarding, behaviour, anti-bullying, curriculum and pastoral arrangements. Where appropriate, sanctions and support will be considered in line with relevant [school/college] policies

- Kent College Pembury will provide a safe, inclusive and trusted environment where children can speak openly, share concerns and be taken seriously. Concerns will be reported to the DSL in line with this policy.

- Kent College Pembury recognises risks can be compounded where children who are LGB lack a trusted adult with whom they can be open. LGB 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.

8.9 Children who are questioning their gender

- Kent College Pembury recognises that some children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.
- Kent College Pembury recognises that children may express themselves in ways that are less typically associated with their sex, and this is not in itself a safeguarding concern. Staff will avoid making assumptions based on appearance, behaviour, interests or presentation.
- Kent College Pembury will be a respectful environment where bullying, harassment, discrimination and harmful behaviour are not tolerated. Staff will be alert to the potential vulnerabilities of children who are questioning their gender, including bullying, family difficulties, online harm, mental health concerns, psychosocial needs or wider safeguarding concerns.
- Staff will take time to listen to and understand the child's thoughts, feelings and experiences. Staff will remain professionally curious and consider the full context of the child's lived experience, including relationships with family, peers and the wider school environment.
- Kent College Pembury will respond to children who are questioning their gender in line with KCSIE, ensuring that any support is considered as part of the school's wider safeguarding responsibilities and with the child's welfare and best interests as a central consideration. The school will take a careful, considered and recorded approach, recognising that children's individual circumstances, needs and experiences will vary.
- Kent College Pembury will not make assumptions or initiate action regarding social transition. Where a child is questioning their gender, staff will respond sensitively, listen to the child's views and experiences, and consider any support needs or safeguarding concerns in line with this policy.
- Where a child speaks to a member of staff about questioning their gender but does not ask the school to make changes to how they are treated, staff will not normally break confidence unless there is a related safeguarding concern. Where a conversation raises concerns about the child's wellbeing or safety, staff will follow this policy and speak to the DSL.
- Parents/carers will usually be involved as a matter of priority where a child requests support relating to social transition. Their views will be treated with importance and properly considered. In the rare circumstances where

involving parents/carers may place the child at greater risk of harm, the DSL will be involved before parents/carers are contacted or any decisions are made.

- Where a child and their parents/carers requests support or changes in relation to social transition, the school will follow an agreed decision-making process, taking account of KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies. This will include conversations with the Head, DSL, parent/carer and child
- When considering any requests for support with social transition, student will ensure our decision-making process is documented and records are kept.
- Kent College Pembury will be particularly alert to the vulnerabilities of children who have socially transitioned from an early age, including where their biological sex may not be known to peers or some staff. The DSL will be involved in these cases, particularly where support, safeguarding or wellbeing concerns arise as the child approaches or experiences puberty. Any information will be handled sensitively and recorded appropriately.
- Any decision-making will be child-centred and safeguarding-led. The school will consider what is in the best interests of the child, while also taking account of the safety, welfare, rights and needs of other children who may be affected. The child's voice and lived experience will always be carefully considered, however any agreed response may not always be the same as the child's wishes.
- The DSL and relevant senior leaders will be involved in considering any request for support relating to social transition. The school may also consider relevant advice from parents/carers, clinical professionals, the SENCO, mental health lead, pastoral staff or other appropriate professionals, depending on the child's circumstances.
- Kent College Pembury will take a careful approach when considering any request relating to social transition, recognising that such decisions may have significant implications for the child and others affected, and that arrangements may need to remain flexible and open to review.
- Any requests or issues relating to names, pronouns, uniform, toilets, changing rooms, residential accommodation, sport, trips or other school arrangements will be considered through the school's agreed process and in line with KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies.
- Kent College Pembury will ensure that records are accurate and that relevant staff have the information they need to safeguard and support the child. Information will be shared on a need-to-know basis and managed in line with confidentiality, data protection and safeguarding requirements.
- The Kent College Pembury will keep any agreed arrangements under review, recognising that a child's circumstances, wishes or needs may change over time. This includes where new safeguarding information becomes known, where a child wishes to change or reverse previous arrangements, or where arrangements may no longer be meeting the child's needs or the needs of others affected.
- If staff have any concerns about a child who is questioning their gender, including concerns about bullying, mental health, family response, online harm, self-harm, exploitation or any other safeguarding issue, they will report these to the DSL in line with this policy.
- Where a safeguarding or welfare concern is identified, the DSL will consider whether a Request for Support should be made.

8.10 Transitional safeguarding for young people aged 18+

- Kent College Pembury recognises that safeguarding needs do not automatically end when a young person turns 18. Young people aged 18 and over may continue to experience, or be at risk of, abuse, neglect, exploitation, coercion, self-neglect, homelessness, domestic abuse, mental health crisis or other forms of harm.
- Where a safeguarding or welfare concern relates to a young person aged 18 or over, staff will report the concern to the DSL. The DSL will consider the concern in line with relevant safeguarding procedures, the young person's wishes and views, mental capacity, consent, risk, and the need to share information to prevent or respond to harm.
- The DSL will consider which pathway is most appropriate. This may include support within [school/college], adult safeguarding, health, mental health, housing, police, Prevent or other relevant local services.
- Where appropriate, referrals will be made to adult social care in line local adult safeguarding referral pathways, with reference to guidance and resources from the Kent and Medway Safeguarding Adults Board.

- Where the young person is already known to children's services, is a care leaver, has an Education, Health and Care plan, has care and support needs, or is moving between services, the school will consider how information can be shared appropriately to support continuity of safeguarding and support.
- Where there is an immediate risk of harm, emergency services will be contacted using 999. Safeguarding decisions and the rationale for actions taken or not taken will be recorded.

8.11 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 Front Door 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.

9.0 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 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, extreme sexual or physical violence, 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) including those generated by AI , 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.

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 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.

9.1 Generative Artificial Intelligence (AI)

- 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 not permit the use of generative AI tools for work and/or educational purposes unless they have been approved by the school following appropriate risk assessment and, where required, a Data Protection Impact Assessment (DPIA). The risk assessment will evaluate whether the tool meets the DfE generative AI product safety standards expectations and will consider safeguarding, data protection, privacy, confidentiality, age and ability of users, content risks, bias and accuracy, intellectual property, academic integrity, information security and how use will be monitored or reviewed.

- AI tools that record, transcribe, summarise or generate notes from meetings, lessons, training or online discussions must only be used where approved by the school and in line with safeguarding, confidentiality, consent, data protection and acceptable use arrangements. All participants will be made aware where such tools are being used and how any information will be captured, used, stored and shared.
- Kent College Pembury recognises that the use of images online, including through AI tools, can create safeguarding, privacy and data protection risks for children and staff. Images of students or staff must not be uploaded to, generated by, edited in, or shared through AI tools unless risk assessed and approved by the school. Any taking or publishing of images of students or staff will always be in line with our image use, consent, acceptable use, data protection and safeguarding arrangements.
- Kent College Pembury will ensure expectations about the safe and appropriate use of AI are set out in our acceptable use arrangements.
- 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 faciliatated 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.

9.2 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. This includes devices that can send or receive messages or notifications, connect to mobile networks or the internet, record images, audio or video, or share location information, and may include but is not limited to, devices with built-in mobile connectivity, smart phones, smart watches, smart glasses, fitness trackers and other wearable technology
- Our wider approach to mobile phones, smart devices and wearable technology, including expectations for pupils/students, staff, visitors and parents/carers, is set out in our Online Safety and Mobile Devices Policy.
- Kent College Pembury will operate in line with the expectation that schools are mobile phone-free environments by default. Students will not have access to mobile phones during the school day, including during lessons, transition times, breaktimes and lunchtimes, except where an agreed exception applies. Any exceptions will be determined by the school's leadership team in line with safeguarding, behaviour, accessibility, reasonable adjustment and considerations around individual need, and will be set out in the mobile phone and smart technology policy.
- Kent College Pembury recognises that while restrictions on mobile phone use, including operating mobile-free environments, can help to manage safeguarding risks, such measures are most effective when embedded within a wider safeguarding and behaviour framework. Clear, proportionate and consistently applied expectations, alongside education that promotes safe and respectful online behaviour, strong and supportive relationships and robust safeguarding and anti-bullying policies, are essential to support safe and appropriate use.
- Kent College Pembury recognises that safeguarding concerns involving mobile phones, smart devices and wearable technology may arise outside of school but still affect children's safety, wellbeing, relationships, attendance or learning. Such concerns will be reported to the DSL and responded to in line with this policy.
- 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.
- Kent College Pembury will ensure that mobile phone and smart technology expectations do not discourage students from disclosing safeguarding concerns. Where a student needs to report messages, images, videos, posts or other

content as part of reporting a concern, staff will respond in line with this policy, avoid viewing or sharing illegal or harmful content unnecessarily, and report the concern to the DSL.

-

9.3 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.
- Filtering and monitoring are part of our wider safeguarding approach and will be supported by effective supervision, staff training, clear policies, curriculum education, regular risk assessment and timely response to concerns.
- This includes ensuring application of appropriate filtering and monitoring to both static content, as well as dynamic and AI-generated materials, products and/or sytems used.
- Kent College Pembury recognises the distinction between filtering and monitoring. Filtering is preventative and controls access to illegal, inappropriate or harmful content and services. Monitoring observes and reports on user activity to support safeguarding intervention where concerns are identified.

- Filtering and monitoring arrangements will be informed by the school's safeguarding risk profile. This will include the age and ability of children, children who may be at greater risk of harm, how often children access technology, the devices and systems used, remote access arrangements, any use of personal devices, and the risks identified through the Prevent duty risk assessment.

- When implementing appropriate filtering and monitoring, we will ensure that systems are configured to help protect children from illegal, inappropriate and harmful content, while avoiding unreasonable restrictions that could limit what children can be taught about online safety, safeguarding and the safe use of technology.

- Filtering and monitoring form an important part of our online safety and safeguarding responsibilities, but they are not a standalone solution. Kent College Pembury recognises that we cannot rely on filtering and monitoring alone to safeguard students. Effective safeguarding practice, clear policies and procedures, appropriate supervision, classroom and behaviour management, staff training, and regular education about safe and responsible technology use are all essential.

- Students will use search tools, apps, online resources and digital platforms that are appropriate to their age, ability and needs. These will be selected by staff following an informed consideration of safeguarding, educational value, data protection and privacy requirements.

- Internet and technology use will be supervised by staff in a way that is appropriate to student's age, ability, needs and potential risk of harm.

- Kent College Pembury make use of SENSO to monitor use of the internet in real time during lessons.

9.4 Responsibilities

- The governing body has overall strategic responsibility for ensuring that appropriate filtering and monitoring systems and processes are in place as part of the school's wider safeguarding arrangements. This includes ensuring that filtering and monitoring provision is reviewed, that roles and responsibilities are clear, and that leaders and relevant staff understand how to manage systems effectively and escalate safeguarding concerns when identified.

- Louise Payne, a member of the senior leadership team, has operational responsibility for filtering and monitoring and will work with a governor representative to ensure there is oversight of the school's approach to meeting the DfE Filtering and monitoring standards.
- Our senior leadership team is responsible for:
    - ensuring filtering and monitoring systems are appropriate to the school context and safeguarding risk profile.
    - procuring filtering and monitoring systems.
    - documenting decisions on what is blocked or allowed and why.
    - ensuring reviews and checks are completed and recorded.
    - overseeing reports.
    - ensuring all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
    - ensuring the DSL and the IT manager have sufficient time and support to manage their filtering and monitoring responsibilities.

- The DSL has lead responsibility for overseeing and acting on:
    - any filtering and monitoring reports.
    - any child protection or safeguarding concerns identified.
    - checks to filtering and monitoring systems.
- The IT manager has technical responsibility for:
    - maintaining filtering and monitoring systems.
    - providing filtering and monitoring reports.
    - completing technical actions identified following any concerns or checks to systems.
    - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All staff will receive information about filtering and monitoring as part of induction and ongoing safeguarding training. This will include their responsibilities for reporting concerns, responding to incidents, following acceptable use expectations and escalating concerns where filtering or monitoring may not be working effectively.
- All staff, students and parents/carers are expected to follow this policy, the school's acceptable use policy and to report any filtering or monitoring concerns.

9.5 Decision making and reviewing our filtering and monitoring provision

- When procuring or making decisions about filtering and monitoring provision, the senior leadership team will work closely with the DSL and the to ensure systems are appropriate to the school's needs and circumstances.
- Decisions about filtering and monitoring will be informed by the school's safeguarding risk profile. This will include consideration of:
    - the age and ability of students
    - children who may be at greater risk of harm
    - how often students access technology
    - our local context, including contextual safeguarding concerns
    - the devices, systems, platforms and networks in use
    - remote access arrangements
    - the school's Prevent duty risk assessment
    - emerging risks, including mobile platforms, apps, cloud services and generative AI.

- Decisions about what is blocked or allowed, and the rationale for those decisions, will be recorded. Any changes to filtering and monitoring arrangements will be assessed by staff with appropriate safeguarding, educational and technical knowledge and approved by the leadership team. Changes will be logged and recorded.

- Reviews of filtering and monitoring provision will be carried out at least once every academic year by the senior leadership team member responsible for filtering and monitoring, with support from the DSL and IT Manager. Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.
    - Reviews will consider whether filtering and monitoring remain effective across all relevant devices, systems and locations, including school owned devices, mobile devices, apps, embedded browsers, cloud services, remote access, guest access and any permitted personal device use.
    - Filtering and monitoring arrangements will be reviewed earlier than the annual review where there is a safeguarding concern, a change in technology or working practice, the introduction of new systems or devices, changes to remote access or personal device arrangements, or updates to local or national guidance.

- Kent College Pembury will also undertake regular and active checks on filtering and monitoring systems to ensure they are working effectively in practice and as expected.
    - These checks will be recorded and used to provide assurance to the [governing body/proprietor] that filtering and monitoring arrangements remain appropriate, effective and aligned with safeguarding responsibilities.
    - Checks will be undertaken from both a safeguarding and technical perspective and will consider the school context and risk profile. This may include checking different devices, accounts, user groups, filtering policies, locations, apps, mobile devices, remote access arrangements and AI tools, where relevant.
    - .
- Any technical concerns identified through checks or reviews will be escalated to [IT staff/provider]. Any safeguarding concerns identified will be reported to the DSL and responded to in line with this policy.

9.6 Appropriate filtering

- Kent College Pembury's education internet connectivity is provided through Wavenet Limited and Kent College uses Smoothwall to block access to harmful content.
- For more information about how Wavenet and Smoothwall fulfill safeguarding requirements please refer to Kent College's Online Safety and Managing Devices Policy.
-

9.7 Appropriate monitoring

- We will appropriately monitor the use of all school 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:
    - This is achieved through a multi-layered combination of proactive technological monitoring, live classroom management, and physical supervision:
    - Managed devices (including 1-to-1 devices operating offsite) run the Securus client to monitor typed text, search queries, app usage, and on-screen content in real time against dynamic threat libraries Detected risks trigger instant visual context captures (screenshots) and immediate alerts to the Designated Safeguarding Lead (DSL).
    - Teaching staff utilise Senso classroom management during lessons for real-time visibility of student screens. Teachers can actively monitor open tabs, restrict unauthorised apps/websites, and enforce focus modes to maintain digital safety during class.
    - Web activity across all networks, endpoints, and guest Wi-Fi is logged via the Smoothwall appliance and Cloud Filter Unified Client. Audit reports capture username, source IP, Active Directory group, timestamp, and targeted URL/category to identify policy violations, blocked access attempts, and search term risks.
    - Direct visual oversight by staff in classrooms, study areas, and IT facilities complements technical controls to ensure safe digital behaviour.
- In accordance with our Mobile Phone and Smart Devices policy, Kent College Pembury has clear expectations regarding the use of personal mobile phones and smart devices by staff, visitors and students. Where personal

devices of staff and/or visitors are permitted to access school systems or networks, the school will consider how filtering and monitoring applies in line with safeguarding, data protection, human rights and privacy requirements.
    - Phone use is permitted for staff by connecting to the schools BYOD network and authenticating using their school credentials. Visitors are issued short term guest wifi credentials and connect to the guest network
- All users will be informed that use of our devices, systems and networks can/will be monitored and that monitoring will be carried out in line with safeguarding, data protection, human rights and privacy legislation.

- Monitoring systems and processes will be supported by sufficient staff capacity, appropriate safeguarding expertise and clear processes to review, prioritise and act on alerts or reports.
- If a concern is identified via our monitoring approaches:
    - Where the concern relates to students it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
    - Where the concern relates to staff, it will be reported to the headteacher (or proprietor if the concern relates to the headteacher), in line with our staff code of conduct.
    - where the concern relates to a technical issue or system limitation, it will be reported to the relevant senior leader and IT manager.
- Parents/carers 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.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies. This may include, but is not limited to, the emergency services via 999, Kent Police, NCA-CEOP , LADO or Front Door Service.

9.8 Information Security and Access Management

- Kent College Pembury recognises that information security and access management are part of our wider safeguarding responsibilities. Appropriate security measures will be in place to help protect children, staff, systems, personal information and safeguarding records.

- Kent College Pembury will take appropriate action to strengthen cyber security, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks, in line with the DfE Cyber security standards for schools and colleges and relevant data protection law requirements.

- Kent College Pembury will ensure expectations are in place for secure access to systems and information. This includes arrangements relating to passwords, account access, user permissions, multi-factor authentication where applicable, use of school systems, secure storage of information, reporting concerns and responding to incidents.

- Kent College Pembury will review the effectiveness of information security, access management and cyber security arrangements periodically, and in response to cyber incidents, data breaches, system changes, technology developments or updates to national guidance.

- Louise Payne, a member of the senior leadership team and a linked governor, are responsible for ensuring that our school has met the DfE cyber security standards for schools and colleges.

- Staff will report concerns about data breaches, cyber security incidents, inappropriate access to systems, lost or stolen devices, compromised accounts, phishing, malware or risks to safeguarding information in line with school procedures.
- Further information can be found in our Online Safety Policy and Mobile Phone and Smart Devices policy

9.9 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.

9.10 Online Safety Staff Training

- Kent College Pembury will ensure that online safety is included within safeguarding and child protection training for all staff, including at induction and through regular updates.

- Training and updates will include staff roles and responsibilities in relation to online safety, including filtering and monitoring, acceptable use, reporting concerns and responding to online safety incidents.

- Online safety training will be integrated into the school's wider safeguarding training arrangements.

9.11 Educating Students

- Kent College Pembury will ensure that students receive age and ability appropriate education to help them understand online risks and how to stay safe online.

- Online safety education will support students to understand safe and respectful use of technology, including content, contact, conduct and commerce risks, reporting concerns and seeking help.

- Online safety will be addressed through the curriculum and wider safeguarding education, including PSHE/RSHE and other appropriate opportunities.

9.12 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.

9.13 Reviewing online safety

- Kent College Pembury recognises that technology, and the risks and harms related to it, evolve and change rapidly.
- The school will review its approach to online safety at least annually, supported by a risk assessment which considers and reflects the current online risks faced by students.
- The review will consider the effectiveness of the school's wider online safety arrangements, including policies and procedures, staff training, curriculum, student voice, parental engagement, incident records, filtering and monitoring assurance, mobile and smart technology, artificial intelligence, remote learning and information security.
- The governing body, leadership team and DSL will use the outcomes of online safety reviews to identify strengths, address gaps and improve the school's approach to keeping children safe online.

10 Staff Engagement and Expectations

10.1 Awareness, Induction and Training

- All members of staff will be provided with, and are required to read, part one of the current version of 'Keeping Children Safe in Education'.

- School leaders, including the DSL, head, governors and relevant senior leaders, will read the full version of KCSIE to ensure they understand the statutory safeguarding requirements placed on schools and colleges.

- Staff will also be directed to any additional sections of KCSIE, local procedures or school policies that are relevant to their role, responsibilities or the children they work with.

- All members of staff will confirm that they have read and understood the national guidance and safeguarding information shared with them. This is recorded in HR files.

- It is a requirement that all members of staff have access to this policy and confirm that they have read and understood its contents. Staff are expected to re-read this policy at least annually and following any updates, so they understand the school's safeguarding expectations, procedures and reporting arrangements.

- All staff will be made aware of the systems within the school which support safeguarding as part of induction. This will include, but is not limited to:
    - this child protection policy
    - the behaviour policy, including measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying
    - the staff code of conduct including expectations regarding low-level concerns, allegations against staff, whistleblowing, acceptable use of technology, staff/student relationships and communication, including use of social media
    - the school's safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods
    - the role and identity of the DSL and any deputy DSLs
    - how to report safeguarding concerns, including concerns about children, staff, safeguarding practice or online safety.

- All new staff and volunteers, including agency, supply and third-party staff where appropriate, will receive safeguarding and child protection training as part of induction. This will include online safety and an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.

- Induction training will ensure staff understand the school's internal safeguarding processes, how to identify and report, respond and record concerns, and how to follow Kent safeguarding procedures, including the role of the DSL and making a Request for Support to the Front Door Service where relevant. An initial safeguarding induction session for new staff will take place.

- All staff, including agency, supply and third-party staff where appropriate, will receive safeguarding and child protection training, including online safety, which is updated at least annually. This will ensure staff are aware of a range of safeguarding issues, understand their responsibilities and know how to report concerns. This will take place at the start of each term during inset and also through regular weekly safeguarding snippets. Online training will also be allocated to staff throughout the year.

- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach, wider staff training and curriculum planning. This will include staff responsibilities in relation to online safety, acceptable use, mobile phones/smart devices, filtering and monitoring, reporting concerns and responding to online safety incidents.

- In addition to safeguarding and child protection training, all staff will receive regular safeguarding and child protection updates, including online safety, as required and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

- Kent College Pembury recognises the expertise staff build through safeguarding training and through managing safeguarding concerns in practice. Staff will be given opportunities to contribute to and shape school safeguarding arrangements and child protection policies.

- The proprietor and governors will receive appropriate safeguarding and child protection training, including online safety, at induction. This training will support them to provide strategic challenge and assurance that safeguarding policies, procedures and practice are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated at annual governor meetings and also through weekly safeguarding snippet training briefings.

- When considering safeguarding training requirements, Kent College Pembury will have regard to the Teachers' Standards, including the expectation that teachers manage behaviour effectively to ensure a good and safe educational environment and have a clear understanding of the needs of pupils.

- The DSL and head will provide an annual report to the governing body and trustees detailing safeguarding training undertaken by staff and relevant governors/proprietors/trustees. Kent College Pembury will maintain an up-to-date record of safeguarding and child protection training.

- The governing body provides an annual report to the proprietor, detailing the safeguarding arrangements, inter-agency activity and arrangements in place to ensure effectiveness.

10.1 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.

10.2 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).
- 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.

11 Safer Recruitment and Allegations

11.1 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.

- Kent College Pembury will determine whether roles, including volunteer roles, are regulated activity in line with KCSIE, DfE Regulated activity in relation to children: scope supporting guidance and relevant legislation. Appropriate safeguarding checks will be completed before individuals start work or volunteering, as required by 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 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 .

11.2 Allegations/concerns raised in relation to teachers, including supply teachers, trainee 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 a concern or allegation relates to a supply teacher, trainee teacher, contractor, volunteer, agency worker or other third-party member of staff, Kent College Pembury will liaise with the relevant employer, agency, training provider, contractor or other organisation as appropriate. The school recognises that safeguarding responsibilities are shared with the relevant third-party organisation; however, this does not remove the school's responsibility to take appropriate safeguarding action, record decisions and involve the LADO where the concern meets, or may meet, the harm threshold.
- Where the concern relates to a trainee teacher, the school will consider the concern in line with Part four of KCSIE, local Kent allegations management arrangements and any relevant partnership arrangements with the training provider. Safeguarding action will not be delayed while responsibility for employment, placement or training arrangements is clarified.

- 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.

11.2.1 Concerns that meet the 'harm threshold'

- Kent College Pembury recognises that it is possible for any member of staff, including volunteers, trainee teachers, proprietor, 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 the ALPHA Schools Group CEO.
- In the event of allegations of abuse being made against the Head, staff are advised that allegations should be reported to the proprietor who will contact the LADO and ALPHA Schools Group 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.
- The school is responsible for deciding whether a Request for Support to the Front Door Service is required for the child or any other children affected. This may be discussed with the LADO as part of allegations management, but the school will not delay appropriate safeguarding action and will act in line with KSCMP procedures, the Kent Support Levels Guidance and section 3 of this policy.
- If staff are concerned that appropriate safeguarding action is not being taken following an allegation about an adult working with children, they are advised to follow the school whistleblowing procedure and/or to contact the LADO directly themselves.

11.2.2 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.

11.2.3 Safe Culture, including Whistleblowing

- 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, trainee 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 takes 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 ALPHA Schools Group as the proprietor.
- 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.
- Where an allegation is made against the headteacher this should be reported to the Chair of Governors who will liaise with the local authority, the ALPHA Schools Group and partner agencies.

12 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.
- Kent College Pembury recognises the value of external organisations and speakers in enriching safeguarding education. External organisations and speakers will be assessed before they are given access to students. This may include considering the educational value of the input, the age and ability appropriateness of content, alignment with school values and curriculum aims, any safeguarding considerations, and whether relevant checks or supervision arrangements are required.
- When using external visitors or resources, Kent College Pembury will remain responsible for ensuring that safeguarding education is accurate, appropriate, inclusive and delivered in a way that supports children's safety and wellbeing.

13 Physical Safety

13.1 Restrictive Interventions, including the Use of 'Reasonable Force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children, staff or others from harm. This approach is informed by the DfE guidance Restrictive interventions, including the use of reasonable force in schools.

- ‘Restrictive interventions’ is an umbrella term that refers to any action, planned or reactive, that limits a pupil’s movement, liberty or freedom. This includes, but is not limited to:
    - the use of reasonable force.
    - physical restraint.
    - non force restrictive practices.
    - seclusion, where a pupil is prevented from leaving a space for safety reasons
- Kent College Pembury is committed to minimising the need for restrictive interventions through positive behaviour support, early intervention and de-escalation strategies.

- Restrictive interventions will only be used when necessary, never as a punishment, and only where there is a real risk of harm.

- Any use of reasonable force will be lawful, necessary and proportionate. It will involve no more force than is necessary, will be used for the shortest possible time, and will depend on the individual circumstances.

- Particular care will be taken when supporting pupils with SEND or other vulnerabilities, recognising that these pupils may be disproportionately affected. Reasonable adjustments and preventative approaches will be considered where appropriate.

- In line with the DfE statutory guidance, all significant incidents involving restrictive interventions, including the use of reasonable force, restraint or seclusion, will be recorded in writing as soon as practicable and reported to parents/carers as soon as practicable, unless doing so would place a child at risk of harm or compromise a safeguarding or criminal investigation.

- Records will be reviewed by school leaders, the proprietor and governors to support safeguarding oversight, identify patterns, consider any disproportionate impact and inform staff training, support and policy development.

13.2 **Safeguarding in physical spaces, sport and residential arrangements**

- Kent College Pembury recognises that safeguarding children includes ensuring that physical spaces, activities and accommodation arrangements are safe, appropriate and protect children’s privacy, dignity and wellbeing.

- Kent College Pembury will consider its safeguarding duties alongside its obligations under equality and human rights legislation when making decisions about toilets, changing rooms, showers, sport, physical education, residential accommodation, educational visits and other physical arrangements.

- Toilets, changing rooms, showers and other intimate or private spaces will be managed in line with KCSIE, relevant premises requirements, safeguarding duties and the school’s local arrangements. The school will ensure that arrangements do not compromise the safety, comfort, privacy or dignity of any child.

- Where a child requires an alternative arrangement in relation to toilets, changing rooms, showers, sport, residential accommodation or similar provision, the school will consider this through a careful, recorded and safeguarding-led process. This will include consideration of the child’s needs and wishes, the safety and welfare of other children, relevant legal duties, practical arrangements and any relevant guidance. Where the request relates to a child who is questioning their gender, this will be considered in line with section 5.12 of this policy.

- Sport, PE and other physical activities will be organised with due regard to children’s safety, fairness, supervision, privacy and individual needs. Where activities are organised by sex for reasons of safety, fairness or safeguarding, arrangements will be made in line with KCSIE, the Equality Act and relevant [school/college] policies.

- Where the school organises overnight visits, trips, camps, boarding, residential accommodation or similar activities, sleeping and accommodation arrangements will be risk assessed and planned to safeguard all children. This will include consideration of supervision, privacy, dignity, individual needs, SEND, medical needs, relationships between children, child-on-child abuse risks and any additional vulnerabilities.

- Any decisions or individual arrangements made under this section will be recorded, reviewed as appropriate and shared with relevant staff on a need-to-know basis, in line with safeguarding, confidentiality and data protection requirements.

13.3 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.

13.4 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.

13.5 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

14 Local Support

- All members of staff in Kent College Pembury are made aware of local support available.

- **Kent Family Help**
  - Kent Support level guidance: www.kscmp.org.uk/guidance/kent-support-levels-guidance
  - Make a Request for Support to the Front Door Service via Kent Integrated Children's Services Portal – select 'urgent' if there is an immediate risk/concern
  - Front Door Service Consultation: 03000 411111
  - Out of Hours Number: 03000 419191

- **Community Based Early Help and Family Hubs**
  - Early Help and Preventative Services - KELSI and Early Help contacts - KELSI
  - Kent Family Hubs - Kent County Council
- **Kent Police**
  - NPCC When to call the police - guidance for schools and colleges
  - Home | Kent Police
  - Telephone 101 or 999 if there is an immediate risk of harm
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - 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
  - Kent and Medway Safeguarding Adults Board: Kent & Medway SAB website

- **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.

Appendix 1: Categories of Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or by others. Abuse can be carried out both on and offline and can be perpetrated by men, women, and other children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Sexual abuse: involves forcing or enticing a child to take part in sexual activities, not necessarily involving 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the [school/college]'s policy and procedures for dealing with it.

Signs that may indicate Sexual Abuse

- Sudden changes in behaviour and/or education performance.
- Depression/withdrawal.
- Regression to younger behaviour.
- Sexualised behaviour or displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation, attempts at suicide
- Fire setting.
- Alluding to secrets which they cannot reveal, secrecy relating to use of technology, or unexplained gifts or money.
- Clinginess and/or need for constant reassurance
- Distrust of familiar adults or anxiety about being left with specific people.
- Fear of undressing, for example for PE.
- Sexually transmitted infection or pregnancy.

The Centre of Expertise on Child Sexual Abuse provides resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

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, abrasions or injuries around the face, mouth, cheeks or soft areas of the body.
- Bi-lateral injuries, fingertip bruising, bite marks, strap marks, welts or injuries suggesting beatings.
- Burns or scalds, including unusual patterns, spread of injuries or deep contact burns such as cigarette burns.
- Injuries that cannot be accounted for, or explanations which are inadequate, inconsistent, excessively plausible, or where there is a delay in seeking treatment.
- Covering arms and legs even when hot.
- Inappropriate or harmful medication use.
- Aggressive behaviour or severe temper outbursts.

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

Signs that may indicate emotional abuse

- Overreaction to mistakes.
- Lack of self-confidence or self-esteem.
- Excessive need for approval, attention and affection.
- Sudden speech disorders.
- Unwillingness or inability to play.
- Extremes of passivity and/or aggression.
- Self-harm, eating disorders.
- Fear of parents being contacted.
- Compulsive stealing or drug, alcohol or solvent misuse.
- Secrecy relating to use of technology.

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

Signs that may indicate neglect

- Constant hunger.
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing.
- Frequent lateness, non-attendance or running away.
- Untreated medical problems.
- Loss of weight/being constantly underweight.
- Poor relationships with peers, low self-esteem or withdrawn presentation.
- Compulsive stealing and/or scavenging.
- Rocking, hair twisting or thumb sucking.

Appendix 2: Support Organisations

KSCMP

- Worried about a child: www.kscmp.org.uk/guidance/worried-about-a-child
- 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 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
- NSPCC Whistleblowing helpline: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line
- Shout: www.giveusashout.org

Support for pupils/students

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

Support for Adults

- KCC Adult Safeguarding: www.kent.gov.uk/social-care-and-health/adult-social-care/adult-safeguarding
- Kent and Medway Safeguarding Adults Board: https://kmsab.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
- We Stand: https://westand.org.uk/our-services
- Report Fraud: www.reportfraud.police.uk
- Shout: www.giveusashout.org

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
- Information Advice and Support Kent (IASK): www.iask.org.uk

Kent Resilience Hub

- https://kentresiliencehub.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): www.nicco.org.uk
- Prisoners' Families Helpline - https://www.prisonersfamilies.org

Substance Misuse

- We are with you: 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
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Exploitation, violence and modern slavery and trafficking

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: https://kentandmedwayvru.co.uk/
- 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
- Report modern slavery: www.modernslavery.gov.uk
- Unseen: www.unseenuk.org

Honour Based Abuse

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

Radicalisation and hate

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

Child-on-child abuse, including harassment and violence

- NSPCC Problematic and harmful sexual behaviour: https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour
- Rape Crisis: https://rapecrisis.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk/advice/creating-safer-places/help-and-advice-for-schools
- Stop it Now! www.stopitnow.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk/

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.ceopeducation.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.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
- Get Safe Online: www.getsafeonline.org
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk
- Gov.UK: https://kidsonlinesafety.campaign.gov.uk/
- Molly Rose Foundation: https://mollyrosefoundation.org

Mental Health

- KSCMP: www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health
- KSCMP: Navigate Wellbeing: Mental Health Signposting for Education Settings
- Kooth: www.kooth.com
- 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: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/
- MindEd: https://mindedforfamilies.org.uk/
- Kent Therapeutic Alliance and Therapeutic Support Service (KTATSS): https://ktatss.co.uk