

Earlscliffe (Earlscliffe Ltd)
Policy: Safeguarding Policy
Member of SLT responsible: DSL
Date of review: August 2025
Date of next review: August 2026

This is a core Earlscliffe school policy that forms part of 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.

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

Key Contact Personnel in School

SAFEGUARDING ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Peter Scargill	07716 097487
Deputy DSL's	Niall Johnson - Academic	07538 489676
	Karen Taylor - Boarding	07955 314179
	Maria Cordell - MHL	07515 884467
Safeguarding Governor	Paul Ludlow	07584 012130

Contents

What to do if you have a welfare concern?	3
1. Introduction and Ethos	6
2. Definition of Safeguarding	6
3. Context	7
4. Related Safeguarding Policies	9
5. Key Responsibilities	9
6. Recognition and Types of Abuse, Neglect and Exploitation	15
7. Safeguarding and Child Protection Procedures	17
8. Record Keeping	19
9. Multi-Agency Working	20
10. Confidentiality and Information Sharing	20
11. Complaints	21
12. Staff Induction, Awareness and Training	22
13. Safe Working Practice	22
14. Staff Supervision and Support	23
15. Safer Recruitment	23
16. Allegations Against Members of Staff, Volunteers and Contractors	24
17. Child on Child Abuse	26
18. Safeguarding Children with Special Educational Needs and Disabilities	28
19. Online Safety	29
20. Specific Safeguarding Issues	30
21. Monitoring and Review	33
22. Local Support	33
23. National Support	34
24. Safeguarding Adult Students	36

What to do if you have a welfare concern?

Earlscliffe is a boarding school and therefore welfare concerns could occur 24 hours a day, 7 days a week. It is vital staff consider the nature of a boarding school - all in the school community are committed to ensuring that we fulfil our duty of care and ensure all children are safe at all times.

Immediately record your concerns

- Follow the school's procedure – either create a written document or upload a concern to CPOMS
 - Reassure the child
 - Clarify concerns if necessary (TED: Tell, Explain, Describe)
 - Use child's own words
 - Sign and date your records

Inform the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL)

- The DSL will
 - Consider whether the child is at immediate risk of harm e.g. unsafe to go home
 - Access the KSCMP Support Level Guidance document and procedures: (www.kscmp.org.uk)
 - Refer to other agencies as appropriate e.g. Internal or community services, LADO, Police or Request for Support
 - If unsure then consult with the Safeguarding Governor or Area Education Safeguarding Advisor (0301651340)
 - Local Authority Social Worker at Integrated Front Door 03000 411 111
 - Record decision making and action taken in the pupil's Child Protection / safeguarding file / CPOMS

If you are unhappy with the response

- Staff
 - Contact Safeguarding Governor
 - Follow Whistleblowing procedures
- Pupils and Parents:
 - Follow school complaints procedures

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

1) 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

2) Review and request further support (if necessary)

Why are you concerned?

- For example
 - Allegation/ child shares a concern or worry
 - Indicators of abuse or neglect
 - Witnessed concerning behaviour
 - Behaviour change

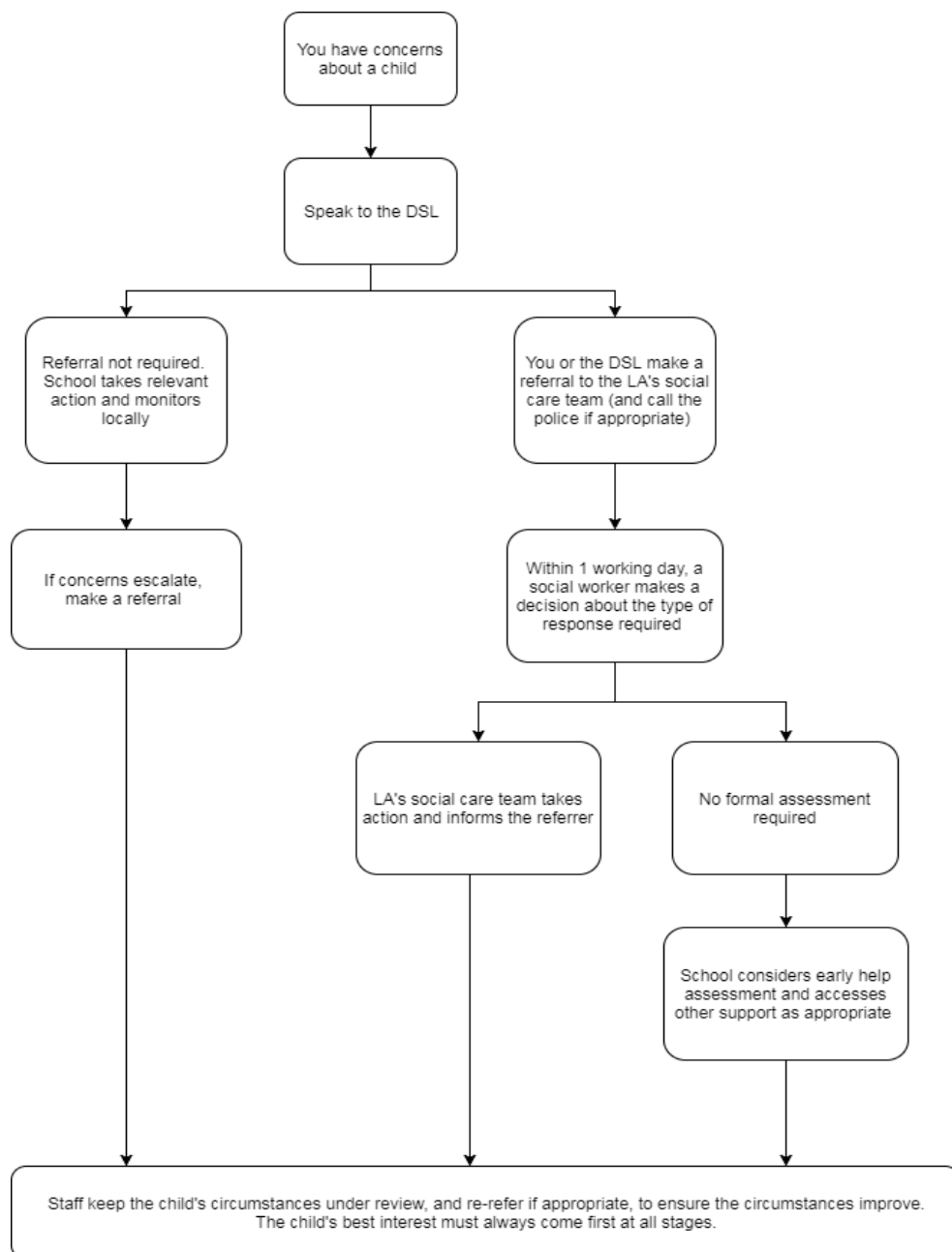


Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action.)

1. Introduction and Ethos

Earlscliffe is a community and all those directly connected (staff, governors, guardians, parents, families and pupils) have an essential role to play in making it safe and secure. Earlscliffe recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and child protection is at the forefront and underpins all relevant aspects of process and policy development at Earlscliffe.

Earlscliffe recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. Where there is a safeguarding concern, children's wishes and feelings should be taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and they can safely express their views.

Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse. Staff might also overhear conversations that suggest a child has been harmed or might receive a report from a friend of the child.

Our school core safeguarding principles are:

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

Earlscliffe understands that good safeguarding requires a continuing commitment from governing bodies, proprietor, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures and consequentially enshrined in its ethos.

2. Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as as per KCSIE 2025 (July 2025)

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, 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

All safeguarding policies will be reviewed on an annual (minimum) basis by the Governing Body which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead / Head Teacher will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

There are four main elements to our child protection policy

- **Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);

- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

The school recognizes the central importance of wellbeing and good mental health to its students, and will endeavour to give proactive support to any student experiencing mental health problems.

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and governors and are consistent with those of Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

3. Context

This policy is based on the following statutory and non-statutory guidance

- Core statutory guidance for education settings (England):
 - Keeping children safe in education (KCSIE), DfE, September 2025.
 - Working together to safeguard children, DfE, December 2023.
 - What to do if you're worried a child is being abused: Advice for practitioners, DfE, March 2015.
- Legislation and regulations
 - The Education Act 2002.
 - The Education (Independent School Standards) Regulations 2014 (ISS).
 - DfE Independent School Standards: Guidance for independent schools.
 - The Human Rights Act 1998; the European Convention on Human Rights (ECHR).
 - The Equality Act 2010 and the Public Sector Equality Duty (PSED).
 - The Rehabilitation of Offenders Act 1974.
 - The Safeguarding Vulnerable Groups Act 2006.
 - The Female Genital Mutilation Act 2003; Multi-agency statutory guidance on FGM.
- Preventing radicalisation (England & Wales)
 - Prevent duty guidance: England and Wales.
 - DfE series: The Prevent duty – safeguarding learners vulnerable to radicalisation Sept 2023.
 - Channel duty guidance: Protecting people susceptible to radicalisation.
- Attendance and children missing education
 - Working together to improve school attendance.
 - Children missing education – guidance for local authorities.
- Online safety & digital standards
 - Teaching online safety in schools.
 - DfE Meeting digital and technology standards in schools and colleges — Filtering and monitoring standards.
 - UKCIS Sharing nudes and semi-nudes: advice for education settings
 - NSPCC online safety guidance for schools.
 - NSPCC Learning
- Boarding & residential provision
 - National Minimum Standards for Boarding Schools, DfE, 2022.
- Safer recruitment / conduct & investigations
 - Teacher misconduct: the prohibition of teachers (DfE, Feb 2022) and Report serious teacher misconduct service.

- PACE Code C: Detention, treatment and questioning of persons by police officers (Dec 2023) — appropriate adult requirement for under-18s.
- Curriculum and wider safeguarding education
 - Relationships, Sex and Health Education (RSHE) statutory guidance: Revised July 2025 for implementation from 1 Sept 2026;
- External providers / activities & alternative provision
 - After-school clubs, community activities and tuition: safeguarding guidance for providers (Sept 2023).
 - Arranging Alternative Provision – guide for local authorities and schools (Feb 2025).
- Security & terrorism protection (premises duties)
 - Terrorism (Protection of Premises) Act 2025 (“Martyn’s Law”) — Home Office factsheets; SIA regulatory role updates.
- Local multi-agency procedures
 - Kent & Medway Safeguarding Children online procedures and strategies (KSCMP/MSCP).

Section 175 of the Education Act 2002 places a duty on local authorities and the governing bodies of maintained schools to make arrangements to safeguard and promote the welfare of children. Section 157 of the Education Act 2002, through the Education (Independent School Standards) Regulations 2014, places the same duty on proprietors of independent schools (including academies and free schools). All schools and colleges must have regard to the statutory guidance issued by the Secretary of State — currently Keeping Children Safe in Education (DfE, September 2025).

All at Earlscliffe understand that the welfare of the child is paramount. Earlscliffe will always follow guidance and emergency procedures when necessary.

The school acknowledges that safeguarding risks are wide-ranging, and this policy recognises a range of specific safeguarding issues, including but not limited to:

- Bullying (including cyberbullying)
- Child abduction and community incidents
- Children and the court system
- Children who are absent or missing from education (CME)
- Children with family members in prison
- Children in kinship care
- Child missing from home or care
- Exploitation, including:
 - Child sexual exploitation (CSE)
 - Child criminal exploitation (including county lines)
- Child-on-child abuse (including sexual violence, sexual harassment, and harmful sexual behaviours)
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith-based abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and serious youth violence
- Gender-based abuse and violence against women and girls (VAWG)
- Hate incidents and prejudice-based abuse
- Honour-based abuse (HBA)
- Homelessness

- Human trafficking and modern slavery
- Mental health concerns
- Misinformation, disinformation, and conspiracy theories (online and offline)
- Missing children and adults
- Online safety, including filtering and monitoring standards
- Prevent duty (radicalisation and extremism)
- Private fostering arrangements
- Relationship abuse
- Youth-produced sexual imagery (“sexting” or “nudes and semi-nudes”)
- Voyeurism offences, including ‘upskirting’

(Also see Annex B of Keeping Children Safe in Education, September 2025).

4. Related Safeguarding Policies

This policy is one of a series in the school’s integrated safeguarding portfolio and should be read in conjunction with:

- Anti-Bullying and Online Safety Policy (including cyberbullying)
- Student Acceptable Use of IT Policy
- Staff Acceptable Use of IT Policy
- Staff Code of Conduct (including guidance on staff/pupil interaction and low-level concerns)
- Safer Recruitment and DBS Policy
- Boarding Welfare Policy (including homesickness, crisis management, adults staying with resident staff, and supervision of visitors)
- Missing Pupils Policy
- Health & Safety Policy (including Fire Safety, Accident Reporting, Security)
- Risk Assessment Policy (including trips and visits)
- Whistleblowing Policy
- Confidentiality and Data Protection Policy
- Photography and Use of Images Policy
- Supervision of Pupils Policy
- Safeguarding External Contractors, Drivers, and Escorts Policy
- Behaviour Policy
- RSHE / PSHE Policy (including SMSC and British values)
- Prevent Policy (radicalisation and extremism)
- SEND and Inclusion Policy
- Statement on Use of Restraint
- Complaints Policy
- External Helplines and Counselling Directory (student support)

5. Key Responsibilities

Safeguarding and child protection is everyone’s responsibility.

This policy applies to all staff, volunteers, governors, contractors and visitors to the school, and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school provision, boarding, and all off-site activities.

The school plays a crucial role in **preventative education** within a whole-school approach to preparing pupils for life in modern Britain. We maintain a culture of **zero tolerance** towards sexism, misogyny/misandry, homophobia, biphobia, transphobia, and all forms of sexual violence and harassment.

This is underpinned by our:

- Behaviour Policy
- Pastoral Support System
- Planned RSHE (Relationships, Sex and Health Education) programme, inclusive and regularly delivered, which addresses:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice, and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship, including coercive and controlling behaviour
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, and so-called honour-based abuse such as forced marriage and female genital mutilation (FGM), including how to access support
 - What constitutes sexual harassment and sexual violence, and why these are always unacceptable
 - Online safety, digital resilience, and the risks of harmful online behaviours, including sharing of nudes/semi-nudes, pornography, and exploitation.

The governing body, Headteacher and Senior Leadership Team (SLT) have read and will follow Keeping Children Safe in Education (KCSIE), September 2025.

The school has a nominated governor for safeguarding, who ensures:

- That an effective safeguarding and child protection policy is in place, interlinks with related policies, and is reviewed at least annually or more often as required.
- That locally agreed multi-agency safeguarding procedures are followed.
- That governors receive regular training and updates to enable them to provide strategic challenge and assurance that safeguarding arrangements are effective, including online safety and filtering/monitoring.

The governing body is aware of its obligations under:

- The Human Rights Act 1998
- The Equality Act 2010 and Public Sector Equality Duty (PSED)
- Local multi-agency safeguarding arrangements

The governing body and SLT will ensure that the Designated Safeguarding Lead (DSL) is properly supported to fulfil their statutory role, has sufficient time, funding, training, and resources to carry out their duties, and that deputy DSLs are appropriately trained and resourced.

All staff are required to:

- Read at least Part 1 (or Annex A as directed) of KCSIE 2025 and confirm they understand it.
- Be familiar with and follow this policy and related safeguarding policies.
- Report any concern about a child immediately, in line with school procedures.
- Maintain professional boundaries in line with the Staff Code of Conduct and the school's low-level concerns procedure.

5.1 Designated Safeguarding Lead (DSL)

Our Designated Safeguarding Lead (DSL) is Peter Scargill, Deputy Head (Pastoral and Boarding), who is a member of the Senior Leadership Team.

The DSL takes lead responsibility for safeguarding and child protection, including online safety, and has oversight of the school's filtering and monitoring processes to ensure pupils are safe online.

During term time, the DSL will be available (during school hours) for staff to discuss any safeguarding concerns. When the DSL is absent, one of the Deputy DSLs (DDSLs) will provide cover. Adequate DSL cover will also be in place for out-of-hours, residential boarding, and out-of-term activities.

The DSL will be given the time, funding, training, resources, and support to:

- Provide advice, guidance and support to staff on child welfare and child protection matters.
- Take part in or support staff in attending strategy discussions and inter-agency meetings.
- Contribute to the assessment of children.
- Refer suspected cases to the relevant agency (local authority children's social care, Channel programme, DBS, and/or police) and support staff who make referrals directly.
- Understand the needs and experiences of children at risk of or engaged in harmful sexual behaviour.
- Maintain a good understanding of the school's filtering and monitoring systems in line with DfE Meeting Digital and Technology Standards in Schools and Colleges (2023–25).
- Support staff in recognising concerns about online safety, radicalisation, peer-on-peer abuse, sexual violence/harassment, and contextual safeguarding issues.

The DSL will also:

- Act as the central contact point for all safeguarding concerns.
- Maintain a confidential and accurate recording system, ensuring patterns and trends are identified and acted upon.
- Coordinate safeguarding action for individual children, including monitoring multi-agency plans.
- Ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).
- Liaise with local authority case managers, LADO, police, and social care colleagues as appropriate.
- Discuss the local response to sexual violence and harassment with partners and ensure policies and practices reflect this.
- Ensure staff access appropriate safeguarding training and updates in line with KCSIE 2025 and maintain accurate training records.
- Keep the Headteacher fully informed of significant safeguarding issues.
- Ensure staff understand and use the school's low-level concerns process and staff code of conduct.
- Be confident in knowing what local and national specialist support services are available to support children, including those who are victims and/or alleged perpetrators.
- Be aware that any child being interviewed or searched by the police must have an "appropriate adult" present to support them.

- In responding to allegations that are found to be unsubstantiated, unfounded, false or malicious, consider whether the pupil who made the allegation is themselves in need of support or may have been abused by someone else.
- Promote and oversee the school's role in preventative safeguarding education (e.g. through RSHE, PSHE, assemblies, tutorials, and boarding activities).

The full responsibilities of the DSL and Deputy DSLs are set out in their job descriptions and reflect the requirements of Keeping Children Safe in Education (2025).

5.2 Members of Staff

All staff play a particularly important role in safeguarding as they are in a position to observe changes in children's behaviour and appearance, identify concerns early, provide help, promote welfare and prevent concerns from escalating.

All staff will:

- Read and understand Part 1 of Keeping Children Safe in Education (KCSIE 2025) and, where directed, Annex A. Staff working directly with children will also be familiar with Annex B.
- Review this guidance at least annually and sign a declaration at the start of each academic year to confirm they have done so.
- Follow Earlscliffe's safeguarding procedures, including the staff code of conduct and low-level concerns process.
- Reinforce the importance of online safety when communicating with parents/carers, including transparency about online learning activities and platforms.
- Provide safe spaces for all pupils, including those who identify as LGBTQ+, to speak out and share concerns.
- Challenge inappropriate, discriminatory or harmful behaviour, including sexism, misogyny/misandry, racism, homophobia, biphobia, transphobia, and sexual harassment.
- Report any safeguarding concern immediately to the DSL or a Deputy DSL, in line with school procedures.

All staff will be aware of:

- The school's safeguarding systems, including: this policy, the behaviour policy, the online safety policy, the staff code of conduct, the safeguarding response to children missing education, and the identity and role of the DSL and deputies.
- The early help assessment process, their role in identifying emerging problems, liaising with the DSL, and contributing to information sharing with other professionals.
- How to make a referral to local authority children's social care and what role they may play in statutory assessments following a referral.
- What to do if they identify a safeguarding issue or if a child discloses abuse, including how to respond, record, and maintain appropriate confidentiality.
- The signs and indicators of abuse, neglect and exploitation, including:
 - Domestic abuse and sexual abuse (including coercive and controlling behaviour, and high-conflict parental relationships).
 - Child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE) and county lines.
 - Grooming and radicalisation.
 - Serious youth violence.
 - Female genital mutilation (FGM).
 - Fabricated or induced illness.
- Contextual safeguarding risks such as gangs, trafficking and online harm.

- The role of technology and social media in presenting risks, and how filtering, monitoring, and digital education support pupils' safety.
- That children may face multiple and intersecting risks simultaneously.
- That children with SEND, those who are perceived to be LGBTQ+, and those facing additional vulnerabilities may face greater risks.
- The importance of reassuring all victims that they are being taken seriously, listened to, and will be supported and kept safe.

5.3 Children and Young People

At Earlscliffe, children and young people have the right to be protected from harm and to feel safe in school and in boarding. Pupils will be supported to develop the knowledge, resilience, and confidence to safeguard themselves and others.

Children and young people have a right to:

- Feel safe at all times, both in school and in boarding, including when using online platforms and devices.
- Be listened to, and have their wishes and feelings taken seriously and appropriately considered in all decisions affecting them.
- Confidently report abuse or concerns, knowing they will be treated seriously, fairly and sensitively, and that their voice will be central to any response.
- Safely express their views and give feedback, including contributing to the development and review of the school's safeguarding policies and practices through forums such as the Student Council, boarding committees, and surveys.
- Receive help from a trusted adult at any time of day or night, including knowing how to contact the DSL, DDSLs, boarding staff, and independent helplines.
- Learn how to keep themselves safe, both in person and online, by:
 - Recognising risk and unsafe situations.
 - Understanding healthy and respectful relationships, boundaries and consent.
 - Knowing how to seek help when needed.
 - Building digital literacy, resilience and awareness of online harms.
- Be respected and supported regardless of age, disability, gender, ethnicity, faith, culture, sexuality, or background.
- Access the complaints and whistleblowing processes in a child-friendly way, ensuring they can raise issues if they feel their concerns have not been listened to.

5.4 Parents and Carers

Parents and carers play a vital role in safeguarding and child protection. The school works in close partnership with families to promote children's safety, wellbeing and development.

Parents and carers have a right to:

- Feel confident that their child is safe, cared for and protected in school and boarding.
- Be informed about the school's safeguarding policies and procedures, including how concerns are managed.
- Raise concerns about their child's welfare or the welfare of others, and know that these will be treated seriously, listened to, and acted upon appropriately.
- Access advice and support, including signposting to external agencies and services where appropriate.
- Be kept informed, within the limits of confidentiality, about concerns raised in relation to their child and the actions taken.

Parents and carers have a responsibility to:

- Work in partnership with the school to support their child's safety, wellbeing and education.
- Communicate openly and honestly with staff about any safeguarding, welfare or health concerns.
- Support the school's safeguarding policies, including those relating to online safety, attendance, behaviour, boarding and student supervision.
- Promote safe behaviours at home and online, in line with the guidance pupils receive at school.
- Make every effort to ensure their child attends school regularly and on time, and returns promptly at the start of each term.

5.5 The Governing Board

The Governing Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection underpin all aspects of policy and practice.
- Evaluate and approve this policy at each review (at least annually, at the April meeting), ensuring it complies with statutory requirements, and hold the Headteacher to account for its implementation.
- Be aware of its obligations under:
 - The Human Rights Act 1998
 - The Equality Act 2010 (including the Public Sector Equality Duty)
 - Local multi-agency safeguarding arrangements
 - Independent School Standards (2014, updated 2019) and National Minimum Standards for Boarding Schools (2022)
- Appoint a Safeguarding Governor, who will monitor the effectiveness of safeguarding arrangements in conjunction with the full board. This role is always separate from the DSL.
- Ensure safeguarding training for all staff, including online safety, at induction and regularly thereafter, in line with Keeping Children Safe in Education (DfE, 2025) and advice from the 3 safeguarding partners.
- Review online safety provisions, ensuring that:
 - The school has appropriate filtering and monitoring systems in place, proportionate to the school's context, age range and boarding provision.
 - The DSL has lead responsibility for understanding and overseeing filtering and monitoring systems.
 - Leadership and staff are aware of the provisions in place and their roles in safeguarding children online.
 - DfE Filtering and Monitoring Standards (2023/25) are regularly reviewed with IT staff and providers.

The Governing Board will also make sure that:

- The DSL has the appropriate authority, time, funding, training, resources and support to carry out their role effectively.
- Online safety is embedded as a cross-cutting safeguarding theme across policies, RSHE, the curriculum and boarding life.
- Procedures are in place to manage safeguarding concerns about staff that fall below the harm threshold (low-level concerns), and clear processes exist for managing allegations about staff, volunteers, supply staff and contractors.
- The specific safeguarding needs of children with SEND, medical or physical health conditions, or additional vulnerabilities (including those living away from home in boarding), are explicitly addressed.

Where another body provides services or activities on school premises (whether or not the children are enrolled at the school), the governing board:

- Seeks assurance that the other body has effective safeguarding and child protection policies and procedures in place, inspecting them where necessary.
- Ensures arrangements are in place for liaison about safeguarding.
- Makes safeguarding compliance a condition of any lettings or service agreement, with provision to terminate if the body fails to meet safeguarding standards.

The Chair of Governors will appoint a Governor as case manager if an allegation of abuse is made against the Headteacher.

All governors will:

- Read Keeping Children Safe in Education (DfE, September 2025) in its entirety.
- Complete appropriate safeguarding and child protection training at induction, with regular updates thereafter.
- Complete a Level 1 safeguarding course as a minimum.
- Ensure that the Safeguarding Governor and Compliance Director maintain a Level 3 safeguarding qualification.

5.6 The Headteacher

The Headteacher is responsible for the effective implementation of this policy, including ensuring that:

- Staff and volunteers (including temporary and supply staff):
 - Are informed of the school's safeguarding systems and procedures as part of their induction.
 - Have read and understood the relevant sections of Keeping Children Safe in Education (DfE, 2025).
 - Understand and follow the procedures outlined in this policy, particularly those concerning the early help process and referrals of suspected abuse or neglect.
- Parents and carers are made aware of this policy when their child joins the school, and that it is available via the school website.
- The DSL has sufficient authority, time, funding, training, resources and support to fulfil their role effectively, and that there is always adequate cover if the DSL is absent.
- The DSL receives a yearly appraisal, with safeguarding leadership explicitly reviewed.
- The Headteacher acts as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer (except where the allegation is against the Headteacher, in which case the Chair of Governors acts as case manager).
- The Headteacher is responsible for the management of low-level concerns about staff, though decisions may be made in consultation with the DSL in line with the school's low-level concerns policy.
- Safeguarding is embedded within the school's culture, ensuring a whole-school approach that includes boarding, curriculum, behaviour, pastoral care, online safety and attendance.

6. Recognition and Types of Abuse, Neglect and Exploitation

All staff should be aware of the definitions and indicators of abuse, neglect and exploitation. Exercising professional curiosity and knowing what to look for is vital for the early identification of harm so that staff can recognise children who may be in need of help or protection.

Abuse and exploitation can occur:

- Inside and outside the family, in school and in the wider community
- Online as well as face-to-face
- Between adults and children, or between children themselves (child-on-child abuse)

Abuse and safeguarding concerns are rarely standalone events. In most cases, multiple issues will overlap. If staff are ever unsure, they must speak with the Designated Safeguarding Lead (DSL) or a deputy without delay.

6.1 Categories of Abuse

Physical abuse: May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also occur when a parent or carer fabricates symptoms of, or deliberately induces, illness in a child.

Emotional abuse: The persistent emotional maltreatment of a child which can have severe and adverse effects on emotional development. It may include:

- Making a child feel worthless, unloved or only valued in meeting another's needs
- Silencing, mocking or preventing the child's voice being heard
- Developmentally inappropriate expectations or interactions
- Overprotection, limiting learning or social interaction
- Seeing, hearing or experiencing the ill-treatment of another
- Serious bullying (including cyberbullying)
- Some level of emotional abuse is present in all types of maltreatment.

Sexual abuse: Involves forcing or enticing a child to take part in sexual activities, whether or not they understand what is happening. This includes:

- Contact abuse (penetrative or non-penetrative acts such as rape, oral sex, kissing, touching)
- Non-contact abuse (exposure to or production of sexual images, watching sexual activities, grooming – online or offline)
- Sexual abuse can be committed by males or females, adults or children, and can be facilitated online. The sexual abuse of children by other children is a recognised safeguarding issue in education.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may involve failing to:

- Provide adequate food, clothing or shelter (including exclusion or abandonment)
- Protect a child from harm or danger
- Ensure adequate supervision (including inappropriate caregivers)
- Provide access to appropriate medical care or treatment
- Neglect may also include maternal substance misuse during pregnancy or a failure to meet emotional needs.

6.2 Specific Safeguarding Concerns

Extra-familial harms: Children may be at risk of abuse and exploitation outside their home or family, including sexual abuse, domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, county lines, serious youth violence and radicalisation.

Technology and online abuse: Technology is a significant factor in many safeguarding issues. Risks include online grooming, harassment, misogynistic or misandrist abuse, non-consensual sharing of indecent images, and the circulation of harmful or abusive content in chat groups.

Child-on-child abuse: Children can abuse other children in person and online. This includes bullying, sexual violence, sexual harassment, physical assault, coercion into sexual activity, sexting/youth produced images, upskirting, hazing/initiation rituals and abuse within intimate personal relationships.

- Staff must never dismiss behaviours as “just banter” or “part of growing up”.
- Even without reports, staff should not assume it is not happening.
- All inappropriate behaviour between children must be challenged.

Child criminal exploitation (CCE): Children may be exploited into transporting drugs, money or weapons (county lines), working in illegal settings, committing theft, violence or other crimes. They may feel trapped through coercion, debt, threats or violence. Both boys and girls are at risk, and girls may also be subject to sexual exploitation within CCE.

Child sexual exploitation (CSE): A form of sexual abuse which may be prolonged or a one-off incident, often involving coercion, grooming or the exchange of something the child needs or wants. It can affect any child, including those aged 16–17 who may believe they are in a “relationship”.

Domestic abuse: Children can be direct victims of domestic abuse, or harmed by seeing, hearing or experiencing its effects. This also includes teenage relationship abuse. All forms, psychological, physical, sexual, financial or emotional, can have serious long-term impact.

Female Genital Mutilation (FGM): All staff must be alert to indicators of risk. Teachers have a specific legal duty: if, in the course of their work, they discover that FGM appears to have been carried out on a girl under 18, they must report it to the police immediately.

Mental health: Staff are well-placed to notice changes in behaviour that may indicate a child is experiencing or at risk of abuse, neglect or exploitation. Only trained professionals can diagnose mental health conditions, but safeguarding concerns linked to mental health must be referred to the DSL.

Serious violence: Warning signs can include unexplained absences, gifts or possessions, older friendships, unexplained injuries, or signs of self-harm. These may indicate involvement in gangs, knife crime or other forms of serious violence.

6.3 Indicators and Additional Guidance

Examples of indicators and additional guidance on specific forms of abuse and safeguarding issues are included in Annex B of KCSIE (2025). Leaders and staff who work directly with children are expected to be familiar with this information.

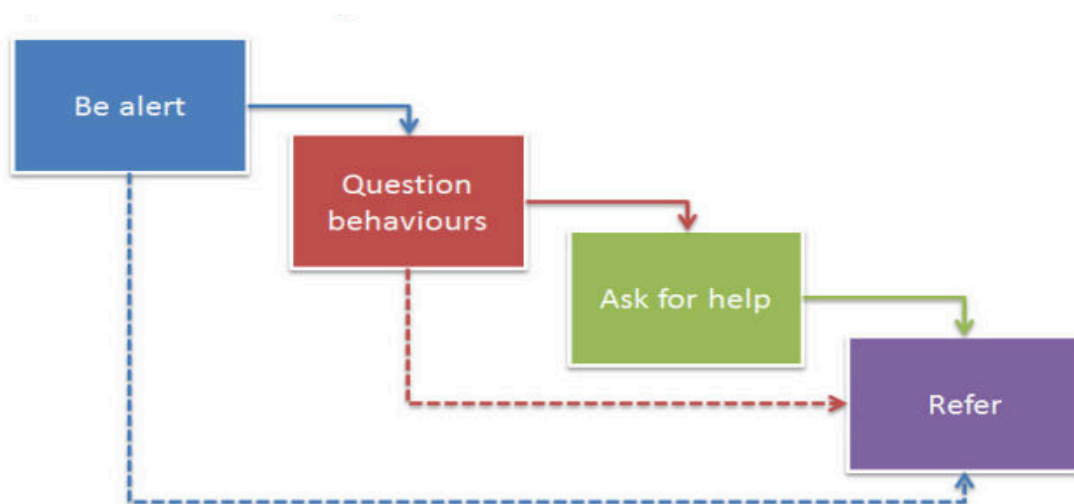
7. Safeguarding and Child Protection Procedures

Earlscliffe adheres to the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) Safeguarding Children Procedures. The full procedures and guidance on specific safeguarding issues can be accessed via the KSCMP website: <https://www.kscmp.org.uk>.

7.1 Core Principles

- The role of the school where there are child protection concerns is not to investigate but to recognise, record and refer.
- Staff must exercise professional curiosity and act on their concerns, even if they are unsure. Safeguarding concerns are rarely standalone issues.

- The child's voice is central: their wishes and feelings will always be considered in decisions about support and protection.
- Staff must maintain an attitude of "it could happen here".



7.2 The Four Stages of Action

It may not always be appropriate to move through these stages sequentially. If a child is in immediate danger or at risk of significant harm, a request for support must be made immediately to Children's Social Work Services and/or the police.

Recognise and Respond:

- Any member of staff may have a concern about a child's welfare.
- Concerns must be reported immediately to the DSL (or Deputy DSL in their absence).
- Staff may also contact the Front Door directly, but must inform the DSL as soon as possible afterwards.

Record:

- All concerns, discussions, decisions and reasons for decisions must be recorded in line with school policy.
- Records must be detailed, accurate, timely and stored securely.

Refer:

- The DSL will decide whether to make a referral/request for support to the Front Door, taking advice from the Education Safeguarding Service or a social worker if necessary.
- Where early help is appropriate, the DSL will support staff in liaising with other agencies and setting up support.
- The DSL will keep all cases under constant review, escalating to statutory services if the situation does not improve or deteriorates.

Review and Escalate:

- If a child's situation does not appear to be improving, the DSL (or referrer) will consider re-referral.
- Professional disagreements (escalation) will be managed in line with KSCMP procedures.
- Staff who remain concerned about a child after following internal processes must use the escalation procedure and continue to act in the best interests of the child.

7.3 Early Help

Staff are expected to identify emerging problems, share information, and contribute to early help assessments.

Some staff may act as a lead practitioner in early help cases, working alongside families and other professionals.

All early help work will be regularly reviewed, with consideration for escalation if concerns persist.

7.4 Parental Involvement

In all but exceptional circumstances, parents/carers will be informed of concerns and consent sought before making a referral.

Parents/carers will not be informed if doing so would:

- Place a child at risk of significant harm, or
- Undermine a criminal investigation.

7.5 Seeking Advice and Support

The DSL may seek guidance from:

- The Safeguarding Governor
- An Area Education Safeguarding Advisor (Education Safeguarding Service), or
- A social worker at the Front Door.

In the DSL's absence, staff may seek advice from a Deputy DSL, the Safeguarding Governor, the Education Safeguarding Service or directly from the Front Door.

7.6 Staff Responsibilities

All staff are responsible for following this procedure and must know how to:

- Recognise concerns
- Record accurately
- Refer without delay

Staff should feel confident to check back with the DSL on the progress of cases. If they remain concerned, they must escalate in line with the escalation policy.

8. Record Keeping

If a member of staff has a safeguarding concern, they will record contemporaneous notes which are signed and dated and speak immediately to the DSL or DDSL. The DSL or DDSL will then record the concern and subsequent action taken on CPOMS using the statutory guidance detailed below. Records must be completed as soon as possible after the incident/event, using the child's words. All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing via CPOMS. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. CPOMS is used as the secure safeguarding portal, and all records are stored electronically in line with data protection legislation. Access is strictly controlled on a 'need to know' basis.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained. Where the receiving school does not use CPOMS, an encrypted transfer process will be used.

Safeguarding records will be retained in line with statutory and local authority guidance. At Earlscliffe, child protection files will be kept until the child's 25th birthday (7 years after the pupil has reached school leaving age), after which they will be securely destroyed. Electronic records will be permanently deleted from CPOMS, and a

record of the date and method of deletion will be kept by the DSL. This approach is consistent with the requirements set out in Keeping Children Safe in Education (2025) and the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, which emphasise the secure, confidential management and timely disposal of safeguarding records.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached, the justification for those decisions, and the outcome
- be kept confidential, held securely and comply with the DPA 2018 and UK GDPR

The SLT and Governors will be kept informed of any significant issues by the DSL in weekly meetings and reports.

9. Multi-Agency Working

Earlscliffe recognises and is committed to its responsibility to work in partnership with other professionals and agencies in line with statutory guidance, including Working Together to Safeguard Children (WTSC, 2023) and Keeping Children Safe in Education (KCSIE, 2025).

Schools are not the investigating agency when there are child protection concerns. Our role is to recognise, refer, and contribute to the investigation and assessment processes led by statutory services. Earlscliffe will co-operate fully with statutory partners and provide relevant information to support decision-making and safeguarding outcomes.

The DSL (or Deputy DSL) will ensure that:

- The school contributes to and, where appropriate, attends safeguarding meetings including Strategy Meetings, Child Protection Conferences, Core Groups, Child in Need Meetings, and Early Help multi-agency meetings.
- Written reports are prepared and shared in advance of meetings, where required, and will be child-centred, accurate, and timely.
- All relevant staff understand their role in supporting multi-agency safeguarding work, including the provision of early help and targeted interventions.
- Where appropriate, the pupil's wishes and feelings are sought and represented in line with KCSIE 2025 guidance.

The Senior Leadership Team and DSL will work to establish and maintain strong, constructive, and co-operative relationships with relevant professionals in other agencies, including health, children's social care, education, youth services, police, and voluntary sector organisations.

When disagreements arise between agencies regarding safeguarding decisions, Earlscliffe will follow the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) escalation procedures to ensure that the child's best interests remain the central focus.

10. Confidentiality and Information Sharing

Earlscliffe recognises that all matters relating to child protection are confidential. The Senior Leadership Team (SLT) and Designated Safeguarding Lead (DSL) will only disclose information about a pupil to other members of staff on a strictly need-to-know basis in order to safeguard the child.

All staff must understand that:

- While they have duties to maintain confidentiality, they also have a professional responsibility to share information with other agencies where this is necessary to safeguard children.
- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent or limit the sharing of information for safeguarding purposes.
- Where it is necessary to share special category personal data, the DPA 2018 includes 'safeguarding of children and individuals at risk' as a lawful condition for processing. Consent is not required if: it is not possible to obtain it; it would be unreasonable to expect consent to be sought; or doing so would place a child at risk.

Staff must never promise a child that they will keep a disclosure secret, as this may not be in the child's best interests.

Where a child discloses sexual violence or sexual harassment:

- The DSL will consider the victim's wishes carefully but must balance these against the duty to protect the child and others.
- Parents/carers should normally be informed, unless doing so would put the victim at greater risk.
- The principle remains: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral must be made to local authority children's social care.
- Reports of rape, assault by penetration, and sexual assault are crimes and must be referred to the police. This remains the principle even where the alleged perpetrator is under the age of criminal responsibility (10).

Regarding anonymity:

- All staff should be aware of anonymity, witness support, and the criminal process where an allegation is progressing through the justice system.
- Staff must do all they reasonably can to protect the anonymity of any children involved, including limiting knowledge to essential staff only and managing the potential impact of social media.

Earlscliffe follows the government's Information Sharing Advice for Safeguarding Practitioners, including the seven 'golden rules' of information sharing, which provide a framework for safe and effective practice.

If in any doubt about sharing information, staff should always speak to the DSL (or a deputy in their absence).

Confidentiality is also addressed elsewhere in this policy, including in sections on Record Keeping and Managing Allegations Against Staff.

11. Complaints

Earlscliffe has a Complaints Procedure, which is available to parents, pupils, staff, and visitors who wish to raise a concern. This can be accessed via the Shared Drive under Policies or on the school website:

- All complaints and concerns will be taken seriously and addressed in line with the school's procedures, ensuring fairness, transparency, and prompt resolution.
- Where a concern relates to safeguarding or child protection, it will always be treated as a priority and handled in accordance with this policy and statutory guidance.
- Any complaint or concern that constitutes an allegation against a member of staff, volunteer, or contractor will be managed under the processes outlined in Section 16: Allegations Against Staff.

- Concerns about the Headteacher will be directed to the Chair of Governors, in line with statutory requirements.
- Concerns about safeguarding practice more generally can also be raised directly with the Local Authority Designated Officer (LADO) or the Education Safeguarding Service, if appropriate.

12. Staff Induction, Awareness and Training

All members of staff are provided with a copy of Part One of “Keeping Children Safe in Education” (2025), which sets out safeguarding information for all staff.

- Staff who do not work directly with children may read Annex A instead of Part One.
- All school leaders and staff who work directly with children are required to read Part One in full.
- The Designated Safeguarding Lead (DSL), Deputy DSLs and safeguarding leadership team will also read Annex B, which provides important information on specific forms of abuse and safeguarding issues.

Staff will sign to confirm that they have read and understood the relevant sections of KCSIE.

The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school’s internal safeguarding processes as part of their induction.

All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues. Behaviours linked to issues such as drug taking or alcohol misuse, deliberately missing education, and the consensual or non-consensual sharing of nude and semi-nude images/videos can be signs that children are at risk.

All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually, in order to remain up to date with current practice.

All staff members (including temporary staff) will be made aware of the school’s expectations regarding safe and professional practice through the Staff Behaviour Policy and the Acceptable Use Policy (available on the Shared Drive under Policies).

The DSL will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff, and will maintain an up-to-date training register.

Although the school has a nominated lead for the governing body (Paul Ludlow), all governors will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

13. Safe Working Practice

All members of staff are required to work within clear guidelines on Safe Working Practice, as set out in Keeping Children Safe in Education (2025) and the school’s Staff Code of Conduct.

Staff must:

- Be aware of, and act in accordance with, the school’s Behaviour Policy.
- Ensure that any use of physical intervention or restraint is carried out in line with agreed school policy and procedures, only when necessary, proportionate and reasonable, and always recorded and reported.
- Maintain professional boundaries with pupils at all times, being alert to behaviours or situations that could be misinterpreted or lead to allegations.

- Avoid being in one-to-one situations with pupils that cannot be seen or heard by others, unless this is specifically authorised and risk assessed.
- Be particularly mindful of the professional risks associated with the use of social media and electronic communication (including email, mobile phones, messaging apps, and social networking sites) and adhere at all times to the school's Online Safety Policy and Acceptable Use Policy.
- Report any concerns regarding the conduct of staff, volunteers or visitors immediately in line with the school's safeguarding procedures.

14. Staff Supervision and Support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the Designated Safeguarding Lead (DSL) or Deputy DSLs.

The induction process includes familiarisation with child protection responsibilities, the procedures to be followed if staff have any concerns about a child's safety or welfare, and awareness of the systems in place to support safeguarding across the school.

The school provides appropriate supervision, mentoring and support for all staff to ensure that:

- All staff are confident and 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, including advice on managing concerns, disclosures, and referrals.
- All staff have regular opportunities for reflection and review of their own practice, both informally and through appraisal, to ensure continued improvement and compliance with statutory responsibilities.
- Staff working directly with children who are particularly vulnerable (e.g. those in Early Help, Child Protection or Looked After arrangements) receive formal supervision in line with KCSIE and local safeguarding arrangements.

The DSL will also put staff in touch with appropriate outside agencies for professional support if requested. Staff can also access independent help, including their Union, the Education Support Partnership, or similar organisations.

15. Safer Recruitment

Earlscliffe is committed to developing and maintaining a culture of safe recruitment, ensuring that all reasonable steps are taken to recruit staff and volunteers who are suitable to work with children. This commitment extends to staff, supply staff, contractors, governors, and volunteers.

The Governing Body and Senior Leadership Team (SLT) are responsible for ensuring that the school follows safer recruitment processes in line with statutory guidance, including Keeping Children Safe in Education (KCSIE 2025) and the Independent School Standards Regulations (ISSRs).

15.1 Single Central Record (SCR)

The school maintains an accurate and up-to-date Single Central Record (SCR) of all pre-appointment checks, in line with statutory guidance. This record is subject to regular monitoring by the DSL, Compliance Director, and Safeguarding Governor.

15.2 Safer Recruitment Training

At least one person on every recruitment panel will have completed up-to-date safer recruitment training. The training will be renewed in line with national guidance to ensure that best practice is followed at all times.

15.3 Pre-Appointment Checks

As part of the safer recruitment process, the following checks are carried out:

- Verification of identity (with birth certificate as best practice where available)
- Verification of right to work in the UK
- Enhanced DBS check, including children's barred list information where applicable
- A separate barred list check where an enhanced DBS with barred list is required but not yet available (e.g. pending clearance)
- Overseas checks for staff who have lived or worked outside the UK, including overseas criminal record checks and checks on teaching qualifications where appropriate
- Verification of professional qualifications (where relevant)
- Verification of the candidate's mental and physical fitness to carry out their role
- Prohibition from teaching checks via the Teaching Regulation Agency (TRA)
- Section 128 checks for management positions in independent schools (including governors, SLT, and department heads), using the TRA employer access service
- Additional checks for agency and third-party staff, contractors, and volunteers, with written confirmation from providers that all necessary checks have been completed

15.4 Ongoing Suitability

All staff are required to disclose any information that may affect their suitability to work with children, including criminal convictions, cautions, reprimands, warnings, court orders, or changes to circumstances.

Earlscliffe is committed to annual safeguarding declarations and staff code of conduct compliance checks to ensure continued suitability.

15.5 Statutory Compliance

The school is committed to fulfilling its responsibilities under the Childcare Act 2006 (including the Childcare Disqualification Regulations), where applicable.

16. Allegations Against Members of Staff, Volunteers and Contractors

Earlscliffe recognises that it is possible for staff, volunteers, contractors, and visitors to behave in a way that might cause harm to children. All allegations and concerns will be taken seriously and managed in line with Keeping Children Safe in Education (KCSIE 2025), Kent Safeguarding Children Multi-agency Partnership (KSCMP) guidance, and statutory requirements.

16.1 Categories of Concerns

Allegations and concerns fall into two categories:

- High-level allegations: behaviours that may meet the harm threshold.
- Low-level concerns: behaviours that do not meet the harm threshold but may still raise concerns about a person's conduct, suitability, or professionalism.

All staff are trained to understand this distinction and to know how to report both.

16.2 Reporting Allegations

All allegations or concerns must be reported immediately to the Headteacher (or, in their absence, directly to the DSL).

The Headteacher, acting as the case manager (in consultation with the DSL), will determine whether the allegation meets the threshold for a high-level allegation or whether it is a low-level concern.

Where the concern is high-level, the Headteacher/DSL will contact the Local Authority Designated Officer (LADO) within one working day, to agree on next steps.

In the event of an allegation against the Headteacher, staff must report this to the Safeguarding Governor, who will inform the Chair of Governors. The Chair will then contact the LADO.

If the allegation concerns the Chair of Governors, this must be reported to the Chair of the Dukes Advisory Board (Waterloo Place, London, SW1Y 4AR – 020 3696 5300).

16.3 Low-Level Concerns

A low-level concern is any concern, no matter how small and even if it does not meet the harm threshold, that an adult may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct (including behaviour outside of work); and/or
- Raises a doubt about their suitability to work with or have access to children.

Examples of low-level concerns include (but are not limited to):

- Being over-friendly with children
- Having favourites
- Using inappropriate, sexualised, intimidating, or offensive language
- Humiliating pupils
- Breaches of boundaries through electronic communication or social media

16.4 Reporting Low-Level Concerns

Staff must report low-level concerns to the Headteacher as soon as reasonably possible, and within 12 hours where the concern relates to a specific incident.

In the absence of the Headteacher, the concern should be reported to the DSL.

Staff are encouraged to self-report if they believe their own behaviour could be misinterpreted or does not meet expected standards.

16.5 Managing and Recording Low-Level Concerns

The Headteacher (in consultation with the DSL) will decide whether the concern remains low-level or should be reclassified as a high-level allegation.

Low-level concerns will be addressed through management guidance, training, or further support as appropriate.

A central confidential log of all low-level concerns will be maintained. This will be reviewed termly by the Headteacher and DSL to identify any emerging patterns.

The Safeguarding Governor will monitor the effective implementation of the low-level concerns process as part of their oversight responsibilities.

Records of low-level concerns will not be placed on personnel files unless they are reclassified as allegations or result in disciplinary action.

16.6 Principles

All allegations and concerns will be managed fairly, quickly, and consistently, providing effective protection for children and support for those involved.

Confidentiality will be maintained, with information shared strictly on a need-to-know basis.

Staff who raise concerns in good faith will be protected from detriment in line with the Whistleblowing Policy.

16.7 Referrals to External Bodies

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or who has committed a listed offence, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not resigned.

Where a teacher is dismissed (or would have been had they not resigned) due to safeguarding concerns, a referral will also be made to the Teaching Regulation Agency (TRA).

Advice will always be sought from the LADO when deciding whether to make a referral.

17. Child on Child Abuse

Earlscliffe has a zero-tolerance approach to child-on-child abuse. We recognise that children are capable of abusing their peers, and that this abuse can take place:

- inside and outside of school;
- face-to-face or online;
- simultaneously in both environments.
-

We acknowledge that the absence of reports does not mean abuse is not happening, and we will always work from the position that harmful behaviours may be occurring.

17.1 Definition and Types

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 referred to as 'teenage relationship abuse')
- Physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; this may include an online element which facilitates, threatens, or encourages physical abuse)
- Sexual violence (rape, assault by penetration, sexual assault – including any online element which facilitates, threatens, or encourages such violence)
- Sexual harassment (such as sexual comments, jokes, taunting, and online sexual harassment, whether standalone or part of a broader pattern of abuse)
- Causing someone to engage in sexual activity without consent (e.g. forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party)

- Sharing of nude or semi-nude images and videos (consensual or non-consensual, also known as sexting or youth-produced sexual imagery)
- Upskirting (taking images under clothing without consent to view genitals/buttocks, usually for sexual gratification, distress, or humiliation)
- Initiation/hazing rituals (activities involving harassment, abuse, or humiliation, sometimes with an online element)
- Online abuse, including:
 - abusive, harassing, or misogynistic messages;
 - non-consensual sharing of indecent images in chat groups;
 - circulating abusive images and pornography.

17.2 Vulnerability and Risk

Earlscliffe recognises that:

- Sexual violence and harassment can occur between any children, regardless of age or sex, and may involve individuals or groups.
- Certain groups may be more at risk, including girls, LGBT pupils, and children with SEND.
- Victims are likely to find experiences stressful and distressing, potentially affecting attainment, attendance, and wellbeing.
- Children who perpetrate harmful behaviour may themselves have experienced trauma or abuse; support will be provided for them as well as for victims.

17.3 Staff Responsibilities

All staff have a responsibility to:

- Challenge inappropriate behaviours between children, even when they are dismissed as “banter,” “part of growing up,” or “boys being boys.”
- Make clear that sexual violence and harassment are never acceptable, never tolerated, and not inevitable.
- Be alert to the impact of abuse, including on academic progress and emotional wellbeing.
- Recognise that child-on-child abuse may be influenced by age, ability, gender, and culture.
- Report any concern or disclosure immediately to the DSL or a Deputy DSL.

17.4 Action Plan and Prevention

To minimise the risk of child-on-child abuse, Earlscliffe will:

- Implement a robust Anti-Bullying Policy.
- Deliver an age-appropriate PSHE and RSE curriculum, including online safety, consent, healthy relationships, and respectful behaviour.
- Provide multiple trusted adults within the community whom students can approach at any time.
- Train and support the Safeguarding Team to respond swiftly and proportionately to concerns.
- Maintain clear systems for reporting, including anonymous options where appropriate, ensuring pupils feel listened to, believed, and valued.
- Conduct robust risk assessments and provide targeted interventions for pupils identified as potential risks to others.

17.5 Sexual Violence and Sexual Harassment

Staff are trained to understand the definitions under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and causing someone to engage in sexual activity without consent.

Consent is defined as the freedom and capacity to choose; it can be withdrawn at any time. A child under 13 cannot consent to sexual activity. Creating, possessing, or sharing sexual imagery of under-18s (even self-generated) is illegal.

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Sexual harassment is unwanted conduct of a sexual nature, which may occur online or offline, and can include:

- sexual comments or name-calling;
- sexual “jokes” or taunting;
- physical behaviour (deliberately brushing against someone, interfering with clothing, displaying sexual images);
- online harassment (sharing explicit content, unwanted sexual messages, coercion into sharing images).

17.6 Response and Support

All victims will be taken seriously, supported, and offered appropriate safeguarding and pastoral care.

Reports will be managed in line with statutory guidance and with sensitivity to the wishes of the child, while never avoiding necessary action to protect others.

Harmful sexual behaviours will be addressed through safeguarding and behaviour processes, with consideration of the child’s age and stage of development.

Where appropriate, referrals will be made to specialist services, including children’s social care, CAMHS, and the Police.

18. Safeguarding Children with Special Educational Needs and Disabilities

Earlscliffe acknowledges that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These may include an impaired capacity to resist or avoid abuse, difficulties in recognising unsafe situations, or challenges in communicating concerns.

18.1 Increased Vulnerability

We recognise that children with SEND:

- may be more vulnerable to abuse and neglect, including child-on-child abuse, online harm, and exploitation;
- can be disproportionately impacted by issues such as bullying and social isolation;
- may have a reduced ability to understand and navigate complex social situations;
- may display behaviours, mood changes, or injuries that could be wrongly assumed to relate solely to their disability.

18.2 Voice of the Child

Earlscliffe is committed to ensuring that the voice of every child with SEND is heard and acted upon. To achieve this, we will:

- make every effort to provide appropriate support, including the use of adapted communication systems, visual aids, advocacy, or interpreters;
- ensure staff are alert to subtle cues and changes in presentation;
- create safe, trusted opportunities for children to share their experiences and concerns.

18.3 Staff Responsibilities

All staff are expected to:

- remain vigilant to safeguarding concerns, ensuring that behaviours, injuries, or changes in presentation are always explored as potential indicators of abuse and not automatically attributed to a child's SEND;
- recognise that children with SEND may require additional pastoral and safeguarding support, including when managing peer relationships or online interactions;
- challenge low expectations or assumptions about vulnerability;
- work closely with the DSL, SENCo, and external professionals to ensure that safeguarding and additional needs are addressed in a coordinated way.

18.4 Culture and Practice

Safeguarding for children with SEND will be embedded in the curriculum, pastoral systems, and safeguarding training for staff.

The DSL team will consider the needs of children with SEND when making safeguarding decisions, referrals, and when developing risk assessments.

We will maintain a culture of high aspiration, respect, and inclusion, ensuring that children with SEND are afforded the same protection and opportunities to thrive as all other pupils.

19. Online Safety

Earlscliffe recognises that the use of technology presents both opportunities and significant challenges and risks to children and adults, both inside and outside of school. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

The Designated Safeguarding Lead (DSL) has overall responsibility for online safety within the school, supported by the Senior Leadership Team and IT Director.

19.1 Categories of Risk

The breadth of issues classified within online safety is considerable and ever-evolving. Risks can be categorised into four broad areas:

- Content – being exposed to illegal, inappropriate, or harmful material. Examples include:
 - pornography (including AI-generated or deepfake content);
 - fake news and misinformation;
 - racism, misogyny, anti-Semitism, homophobia, ableism, and other discriminatory content;
 - content promoting self-harm, eating disorders, or suicide;
 - radicalisation and extremism.
- Contact – being subjected to harmful online interaction with other users. Examples include:
 - peer-to-peer pressure;
 - harmful commercial advertising and targeted manipulation;
 - adults posing as children or young people with the intention to groom or exploit for sexual, criminal, financial, or other purposes.
- Conduct – online behaviour that increases the likelihood of, or causes, harm. Examples include:
 - making, sending, and receiving explicit images (consensual and non-consensual sharing of nudes and semi-nudes, pornography, and other explicit images);
 - cyberbullying and online harassment;

- creating or sharing abusive or discriminatory material.
- Commerce – risks such as:
 - online gambling;
 - inappropriate advertising;
 - phishing and financial scams;
 - cryptocurrency and other financial exploitation schemes.

19.2 Leadership and Policy

The DSL and leadership team have read Part Two: The Management of Safeguarding – Online Safety in Keeping Children Safe in Education 2025, and the Department for Education’s guidance Teaching Online Safety in Schools (2023).

Online safety is included in staff induction and September INSET training, and is embedded into the PSHE and wider curriculum.

Specific risks linked to smartphones, cameras, and mobile technology are addressed through the Staff Acceptable Use Policy and Mobile and Smart Technology Policy, which are shared with and understood by all members of the school community.

19.3 Technical and Monitoring Measures

Earlscliffe uses Securly, a student safety platform that automatically filters internet content, blocks specified sites, and alerts key staff to inappropriate activity. Reports are regularly reviewed by the IT Director and DSL.

The governing body ensures that the school has appropriate filters and monitoring systems in place, reviewed annually for effectiveness.

We acknowledge that pupils and staff may have access to systems beyond school control (e.g. personal devices using 3G/4G/5G). In such cases, where concerns are identified, appropriate safeguarding action will be taken.

19.4 Education and Support

Earlscliffe ensures a comprehensive whole-school curriculum response that equips pupils with the knowledge and skills to recognise, manage, and reduce online risks.

The school actively supports parents, carers, and staff to become alert to online risks through guidance, updates, and shared resources.

Online safety is treated as a whole-school responsibility, with staff expected to model positive online behaviour and challenge unsafe or harmful online practices.

20. Specific Safeguarding Issues

Earlscliffe recognises that safeguarding is a broad area which encompasses specific safeguarding issues, many of which are identified in Keeping Children Safe in Education (KCSIE) 2025. In Kent, all concerns must be managed in line with the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures.

Where staff have concerns about a child, they must inform the DSL or a DDSL immediately. The DSL will consider the concern against the KSCMP Threshold Guidance and, if appropriate, make a referral to the Kent Front Door Service, who will determine the most appropriate response. Where necessary, the Front Door may involve Kent Police, NHS services, Early Help, or specialist safeguarding teams such as the Kent Police CSE Team or the KSCMP Child Sexual Exploitation subgroup.

The following areas are of particular relevance:

20.1 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual activity in exchange for something the child needs or wants, and/or for the financial advantage or increased status of the perpetrator. CSE does not always involve physical contact and may also take place online.

Indicators may include: going missing from home or school, unexplained gifts or money, relationships with significantly older individuals, poor mental health, alcohol or drug misuse.

Response: Staff must report immediately to the DSL. The DSL will refer to the Kent Front Door Service, which may engage the Kent Police CSE Team or the KSCMP CSE subgroup.

Earlscliffe ensures that CSE awareness is included in PSHE and staff training, and that the vulnerabilities of international boarding students are recognised.

20.2 Child Criminal Exploitation (CCE) and County Lines

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into criminal activity. County Lines refers specifically to gangs and criminal networks who exploit children to move, store, or sell drugs, often using dedicated phone lines.

Indicators may include: unexplained gifts or possessions, increased school absence, new or concerning friendships, decline in academic performance, unexplained injuries, carrying weapons, self-harm, or sudden changes in behaviour.

Response: All concerns are reported to the DSL. The DSL will refer to the Kent Front Door Service, who may involve Kent Police and the local County Lines partnership. Staff are reminded that even where a child appears to have agreed to the activity, they are still a victim.

20.3 Female Genital Mutilation (FGM)

FGM is a criminal offence in the UK and a form of child abuse involving the partial or total removal of the external female genitalia for non-medical reasons.

Mandatory Duty for Teachers: Any teacher who is informed by a girl under 18 that FGM has been carried out on her, or who observes signs that it has been carried out, must report directly to the police. They must also inform the DSL.

Risk indicators: extended absence abroad, talk of a “special ceremony”, family history of FGM, difficulty walking or sitting, reluctance to undergo medical examinations.

Response: All staff concerns must be reported to the DSL. The DSL will follow the KSCMP FGM procedures and refer to the Kent Front Door Service.

20.4 Radicalisation and the Prevent Duty

Radicalisation is the process by which a person comes to support terrorism or extremist ideologies. Schools have a duty under the Counter-Terrorism and Security Act 2015 to prevent children from being drawn into terrorism.

Indicators may include: withdrawal from peers, expressing extremist views, possession of extremist materials, rejecting activities previously enjoyed, increased secrecy around internet use.

Response: Staff must pass concerns to the DSL. The DSL will consult with the Kent Front Door Service and, if appropriate, refer to the Kent Prevent team or Channel programme. Earlscliffe follows its Prevent Policy and ensures filtering and monitoring systems are in place for online safety.

20.5 Serious Violence

Serious violence includes offences such as knife crime, assault, robbery, and gang-related violence.

Risk factors: being male, frequent school absence, school exclusion, previous experience of maltreatment, involvement in offending.

Response: Staff should be alert to early indicators and report concerns to the DSL, who will refer via the Kent Front Door Service where necessary. Issues of serious violence and knife crime are addressed explicitly through PSHE and pastoral work.

20.6 Children Missing from Education (CME)

Children missing education are at significant risk of underachievement, exploitation, radicalisation, and abuse.

Response: At Earlscliffe, unexplained absences are followed up rigorously. The DSL works with the Attendance Officer to monitor patterns. Prolonged or repeated absence is reported to the Local Authority CME Officer via the Kent CME procedures. Where safeguarding concerns are present, the DSL refers to the Kent Front Door Service immediately.

20.7 Domestic Abuse

Domestic abuse is controlling, coercive, threatening, degrading, or violent behaviour between those aged 16 or over, and can include physical, emotional, psychological, financial, or sexual abuse. Children are recognised as victims in their own right if they see, hear, or experience domestic abuse.

Response: Staff must report all concerns to the DSL. The DSL will follow KSCMP Domestic Abuse guidance and, if appropriate, refer to the Kent Front Door Service. Earlscliffe also recognises Operation Encompass in Kent, where schools are notified if a child has been present during a domestic abuse incident.

20.8 Mental Health

Mental health problems can sometimes be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation.

Response: Staff should report any concerns about a pupil's mental health to the DSL. The DSL may refer to the Kent Front Door Service, Early Help, or to health services. Earlscliffe supports students' mental health through PSHE, trained staff, the Wellbeing Champions initiative, and access to external counselling services

20.9 Honour-Based Abuse, including Forced Marriage

Honour-Based Abuse (HBA) includes crimes such as forced marriage and FGM, committed to protect or defend perceived cultural or family honour.

Forcing a person into marriage is illegal in the UK. A lack of consent can be physical, emotional, or due to incapacity.

Response: Any concern must be referred to the DSL, who will contact the Kent Front Door Service. Staff must never attempt mediation with families in cases of HBA.

20.10 Other Safeguarding Issues

Children with Family Members in Prison: Staff should be alert to the risks of stigma, isolation, or poor outcomes. Concerns are referred to the DSL, who may liaise with NICCO or the Kent Front Door.

Children and the Court System: Staff may signpost children to age-appropriate guides produced by HMCTS.

Child Abduction and Community Safety Incidents: Staff should report concerns about suspicious activity around the school site to the DSL, who will liaise with the Kent Police Safer Schools Officer where appropriate.

Use of School Premises by Other Organisations: Where external providers use the premises, written assurance of safeguarding policies and checks will always be sought.

Site Security: All visitors sign in, wear badges, and unknown individuals are challenged. Any threatening behaviour will be treated as a safeguarding issue.

21. Monitoring and Review

This policy will be made available to all staff, volunteers, and temporary staff via the staff handbook, induction processes, and the school intranet. A copy will also be available to parents and guardians on the school website.

Implementation of this policy is the responsibility of all staff, with oversight by the DSL, DDSs, and the Governing Body/Proprietor.

The policy forms part of the School Development Plan and will be reviewed at least annually or sooner if there are changes to statutory guidance (e.g. KCSIE), local safeguarding procedures, or emerging safeguarding issues.

The review will be led by the DSL in consultation with the Senior Leadership Team and the Governing Body/Proprietor, taking into account:

- Updates in legislation and statutory guidance (e.g. KCSIE 2025)
- KSCMP procedures and threshold guidance
- Lessons learned from safeguarding cases, audits, or inspections
- Feedback from staff, students, and parents

The DSL will provide a safeguarding report at least annually to the Governing Body/Proprietor, summarising training, referrals, incidents, patterns or themes, and the impact of safeguarding activity at Earlscliffe.

Any deficiencies or weaknesses identified in safeguarding arrangements will be remedied without delay.

22. Local Support

All staff at Earlscliffe are expected to be familiar with the range of support services available for safeguarding, health, and welfare concerns. Below is a comprehensive, Kent-specific list of key contacts:

Education Safeguarding Team – Kent County Council

- Area Safeguarding Advisor (Education Safeguarding Service)

- Robin Brivio: 03301 651 200
- South Kent Safeguarding Advisors:
 - Gemma Willson (Mon–Tue)
 - Claire Ledger (Wed–Fri)
- General Education Safeguarding Advice
 - Phone: 03000 415 797 / 03301 651 500

Online Safety Advisor – Kent County Council

- Ashley Assiter (Online Safety Advisor)
- Phone: 03000 415 797 / 03301 651 500
- Email: esafetyofficer@kent.gov.uk (non-urgent)

Local Authority Designated Officer (LADO) – Kent

- Phone: 03000 410 888
- Email: kentchildrenslado@kent.gov.uk

Children’s Social Work Services – Kent Front Door & Early Help

- Integrated Front Door (Single Point of Access): 03000 411 111 / 03301 651 340
- Out-of-Hours Service: 03000 419 191
- Early Help Team: 03000 411 008

Kent Police

- Emergency: 999
- Non-Emergency: 101

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

- Phone: 03000 421 126
- Website: www.kscmp.org.uk
- Provides local safeguarding procedures, training, and resources.

23. National Support

Earlscliffe recognises the importance of national agencies and guidance in supporting staff, pupils, and families. The following organisations and resources are recommended in Keeping Children Safe in Education (KCSIE) 2025 and wider statutory guidance. These contacts complement our local Kent safeguarding arrangements.

23.1 Support for Staff

- Education Support Partnership – confidential support and counselling for education staff: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline (UK Safer Internet Centre) – guidance for schools on managing online issues: www.saferinternet.org.uk/helpline

23.2 Support for Pupils

- NSPCC – safeguarding, reporting concerns, and advice: www.nspcc.org.uk
- Childline – 24/7 confidential helpline for children: www.childline.org.uk / 0800 1111
- Papyrus HOPELINE247 – suicide prevention for under-35s: www.papyrus-uk.org / 0800 068 4141
- Young Minds – mental health support for children and young people: www.youngminds.org.uk

- The Mix – support for under-25s on mental health, relationships, and money: www.themix.org.uk

23.3 Support for Adults

- Family Lives – parenting and family support: www.familylives.org.uk
- Crimestoppers – anonymous crime reporting: www.crimestoppers-uk.org / 0800 555 111
- Victim Support – support for victims of crime: www.victimsupport.org.uk
- Kidscape – anti-bullying support: www.kidscape.org.uk
- Samaritans – emotional support for anyone in distress: www.samaritans.org / 116 123
- Mind – mental health charity: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC – supporting non-abusing parents of sexually abused children: www.mosac.org.uk
- Action Fraud – national reporting centre for fraud and cyber crime: www.actionfraud.police.uk

23.4 Support for Learning Disabilities

- Respond – support for people with learning disabilities who have experienced trauma or abuse: www.respond.org.uk
- Mencap – support for people with learning disabilities and families: www.mencap.org.uk

23.5 Domestic Abuse

- Refuge – support for women and children experiencing domestic violence: www.refuge.org.uk
- Women’s Aid – national domestic abuse support: www.womensaid.org.uk
- Men’s Advice Line – support for male victims of domestic abuse: www.mensadvice.org.uk
- Mankind – support for male survivors of domestic and sexual abuse: www.mankindcounselling.org.uk

23.6 Honour-Based Violence and Forced Marriage

- Forced Marriage Unit – government helpline for forced marriage and honour-based abuse: www.gov.uk/guidance/forced-marriage / 020 7008 0151

23.7 Sexual Abuse and Child Sexual Exploitation

- Lucy Faithfull Foundation – child protection charity: www.lucyfaithfull.org.uk
- Stop it Now! – preventing child sexual abuse: www.stopitnow.org.uk
- Parents Protect – information for parents to prevent abuse: www.parentsprotect.co.uk
- CEOP (Child Exploitation and Online Protection Command) – online child protection and exploitation reporting: www.ceop.police.uk
- Marie Collins Foundation – support for children abused online: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF) – reporting child sexual abuse material online: www.iwf.org.uk
- CSA Centre (Centre of Expertise on Child Sexual Abuse): www.csacentre.org.uk

23.8 Online Safety

- Childnet International – resources for keeping children safe online: www.childnet.com
- UK Safer Internet Centre – guidance, helplines and resources: www.saferinternet.org.uk
- Parents Info – expert advice for parents: www.parentinfo.org
- Internet Matters – online safety advice: www.internetmatters.org
- Net Aware (NSPCC / O2) – guide to apps, games and social networks: www.net-aware.org.uk
- ParentPort – complaints about online material: www.parentport.org.uk

- Get Safe Online – online safety advice: www.getsafeonline.org
- Media Smart – media literacy and misinformation awareness: www.mediasmart.uk
- BBC Own It – online resilience and wellbeing: www.bbc.com/ownit

23.9 Radicalisation and Hate

- Educate Against Hate – resources for teachers and parents on preventing extremism: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit (CTIRU) – report terrorist and extremist content: www.gov.uk/report-terrorism
- True Vision – reporting hate crime: www.report-it.org.uk

23.10 Generative AI, Filtering and Cybersecurity

- DfE Plan Technology for Your School – self-assessment tool for filtering and monitoring systems: www.gov.uk
- DfE Generative AI Guidance – expectations for safe and ethical use of AI in education: www.gov.uk
- DfE Cyber Security Standards for Schools and Colleges – national framework for cyber resilience: www.gov.uk

23.11 Relationships, Sex and Health Education (RSHE)

- DfE RSHE Guidance (2025) – updated statutory framework for teaching RSE and health education, effective from 2026: www.gov.uk

24. Safeguarding Adult Students

At Earlscliffe, we have a diverse student community, some of whom are aged 18 or over and therefore legally adults. Whilst the school provides the same high standards of pastoral care and uses the same internal reporting mechanisms for all students, the external safeguarding pathways differ for adult students.

24.1 Principles

It is every individual's right to live in a safe environment, free from harm. Adult safeguarding is about protecting people from abuse and neglect wherever possible and responding swiftly when concerns arise.

24.2 Kent and Medway Safeguarding Adults Board (KMSAB)

Adult students at Earlscliffe who reside in Kent or Medway are supported by the Kent and Medway Safeguarding Adults Board (KMSAB) – a multi-agency statutory partnership working to protect adults at risk of abuse or neglect.

- Website: www.kmsab.org.uk

24.3 Adult Abuse

Abuse can occur in any setting: at home, in care, in public, online, or in educational institutions. It may be a one-off incident or continue over time.

Adults may be more vulnerable to abuse if they:

- have disabilities or long-term health conditions
- rely on others for care or support
- experience isolation or social disadvantage

Types of adult abuse include:

- Physical abuse
- Sexual abuse
- Emotional or psychological abuse
- Neglect or self-neglect
- Financial or material abuse
- Domestic abuse
- Discriminatory abuse (including hate crime)
- Exploitation, human trafficking and modern slavery
- Female Genital Mutilation (FGM)

24.4 Adult Safeguarding Enquiries (Care Act 2014)

Under Section 42 of the Care Act, a Statutory Safeguarding Enquiry must take place if:

- The adult has needs for care and support (whether or not the Local Authority is meeting those needs).
- The adult is experiencing, or at risk of, abuse or neglect.
- The adult is unable to protect themselves because of their care and support needs.

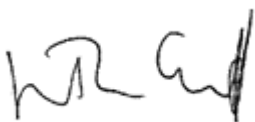
In other circumstances, the Local Authority may carry out a Non-Statutory Enquiry if there are safeguarding concerns but the full Section 42 threshold is not met.

24.5 How to Raise a Concern (Kent and Medway)

If there are concerns about an adult student at Earlscliffe:

- During office hours
 - Online referral form: Report a concern
 - Phone: 03000 41 61 61
 - Text relay (for hearing impaired): 18001 03000 41 61 61
 - Email: social.services@kent.gov.uk
- Out of hours (including nights, weekends and bank holidays)
 - Phone: 03000 41 91 91
- Emergency
 - If an adult is at immediate risk of harm, dial 999 and request emergency services.

Jonathan Cuff, Managing Director: Dukes Education



28th August 2025

Mark Love, Headteacher: Earlscliffe



22nd August 2025