


**Earlscliffe**

Senior School | Sixth Form



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# Safeguarding and Child Protection Policy

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Reviewed: Toby Mullins (Head Teacher)	02/03/2026
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1.	Introduction	4
2.	Relevant Statutory and Non-Statutory Advice.	5
3.	Relevant Policies	8
4.	Key Personnel for Safeguarding and Child Protection	8
5.	Key External Agencies, Services and Professionals' Contact Details	9
6.	Safeguarding Reporting Summary	12
7.	Aims	15
8.	<b>Key Safeguarding Principles</b>	16
9.	<b>SAFEGUARDING AT EARLSCLIFFE – QUICK REFERENCE GUIDE</b>	18
10.	The Designated Safeguarding Lead	19
11.	The Deputy DSLs	21
12.	Responsibilities of the Staff	21
13.	Responsibilities of the Head Teacher	22
14.	Responsibilities of the Board of Governors and Proprietor	22
15.	Contextual Safeguarding	24
16.	Teaching Students How to Keep Safe	24
17.	Children with special educational needs and disabilities (SEND)	26
18.	What to do when there are concerns or if a child makes a disclosure	27
19.	Procedures if staff have a concern about a student	27
20.	Procedures for staff if a student discloses information	28
21.	Mechanisms for students to report concerns	29
22.	Support for staff	29
23.	Recording Safeguarding Concerns	29
24.	DSL Action on receipt of a concern about a student	31
25.	Preserving evidence	31
26.	Child protection records	32
27.	Information sharing	33
28.	Early Help	33
29.	Safer recruitment - Staff	34
30.	Safer recruitment - Governors	35

31.	Visiting Speakers	36
32.	Staff Induction	36
33.	Staff Training	37
34.	DSL and DDSL(s) Training	37
35.	Governor Training	37
36.	Filtering and Monitoring Systems	38
37.	Staff Code of Conduct	38
38.	Whistleblowing	38
39.	Allegations against staff	38
40.	Procedures & Informing the Local Authority Designated Officer (LADO)	39
41.	Allegations relating to supply teachers/employees of third party	42
42.	Referral to the Disclosure & Barring Service and Teaching Regulation Agency	42
43.	Low-Level Concerns	43
44.	Non-recent / Historical allegations	44
45.	Board of Governors and Proprietorial Oversight	45
46.	Use of school premises by external organisations	45
47.	Adults who supervise children on Work Experience	45
	Appendix 1: Categories of abuse and Specific Safeguarding Issues	47
	Appendix 2: Human Rights Act 1998 and Equality Act 2010	72

## 1. Introduction

Earlscliffe is fully committed to safeguarding and promoting the welfare of all students in its care. Safeguarding is at the heart of everything we do and underpins all aspects of school life. We recognise that safeguarding is everyone's responsibility and that all staff, governors, volunteers and visitors have a vital role to play in protecting children from harm.

At Earlscliffe, we take a **child-centred approach**, meaning that at all times we consider what is in the best interests of the student. We recognise that safeguarding is not simply about compliance with procedures, but about creating a culture in which students feel safe, valued, listened to and able to seek help. We actively promote an environment where concerns can be raised openly and where all members of the school community understand that **"it could happen here."**

As a boarding school, Earlscliffe provides care for students on a 24-hour basis during term time. This brings an enhanced responsibility to ensure that safeguarding arrangements are robust, responsive and consistently applied at all times, including evenings, weekends and during off-site activities. Safeguarding considerations therefore extend beyond the classroom into all aspects of boarding life and the wider student experience.

This policy is written with due regard to *Keeping Children Safe in Education (KCSIE) (September 2025)* and reflects the requirements of the Kent Safeguarding Children Multi-Agency Partnership. It applies to all members of the school community and to all situations where Earlscliffe staff are working with students, whether on or off site.

We recognise that:

- Safeguarding and promoting the welfare of children includes protecting them from maltreatment, preventing impairment of their mental and physical health or development, and ensuring they grow up in safe and effective care.
- Abuse and neglect can occur in any setting, and students may not always feel ready or able to disclose concerns.
- All staff are well placed to identify early signs of harm through their daily contact with students and must act promptly on any concern, however small it may seem.

Earlscliffe is committed to:

- Providing a safe, supportive and inclusive environment where students can learn and develop.
- Ensuring that all staff are trained, confident and supported in fulfilling their safeguarding responsibilities.
- Working in partnership with parents, carers and external agencies to protect students from harm.
- Maintaining clear procedures for reporting, recording and responding to concerns.
- Promoting students' understanding of how to keep themselves safe, including online.

All staff must be aware that **any safeguarding concern must be acted upon immediately** and reported in accordance with this policy. Delays in reporting concerns can place students at risk. While the Designated Safeguarding Lead (DSL) and deputies have specific responsibilities, this does not remove the responsibility of every adult in the school to remain vigilant and to take appropriate action.

Safeguarding is fundamental to the ethos of Earlscliffe. By embedding strong safeguarding practices and a culture of openness, vigilance and care, we aim to ensure that every student feels safe, supported and able to thrive.

This Policy is the responsibility of the Head Teacher and is reviewed annually by the Board of Governors as part of the school’s Annual Safeguarding Review or when legislation or government guidance dictates.

This policy is available on the Earlscliffe.co.uk website and it is also available on request from the Designated Safeguarding Lead or main school office.

## 2. Relevant Statutory and Non-Statutory Advice.

This policy is written with regards to both the advice below and in Appendix 1, section 28 of this policy:

Keeping Children Safe in Education (KCSIE), DfE, September 2025	<a href="#">Keeping children safe in education 2025</a>
The SEN Code of Practice 2015	<a href="#">SEND Code of Practice January 2015.pdf</a>
Disqualification Under the Childcare Act 2008 – updated August 2018	<a href="#">Disqualification under the Childcare Act 2006 - GOV.UK</a>
Working Together to Safeguarding Children Updated March 2026	<a href="#">Working together to safeguard children - GOV.UK</a>
Working Together to Improve School Attendance August 2024	<a href="#">Working together to improve school attendance (applies from 19 August 2024) (publishing.service.gov.uk)</a>
DfE statutory guidance ‘Children missing education – Updated August 2024 for Local Authorities and other groups supporting children’s attendance	<a href="#">Children Missing Education - Guidance for Local authorities</a>
The Independent School Standards (England) Regulations, DfE, 2014. Updated 2019	<a href="#">The Independent School Standards - Guidance for independent schools - GOV.UK</a>

The National Minimum Standards for Boarding, DfE updated 2022	<a href="#">Boarding schools: national minimum standards - GOV.UK</a>
DfE Guidance What to do if you're worried a child is being abused (March 2015)	<a href="#">What to do if you're worried a child is being abused - GOV.UK</a>
Relationships, Sex and Health Education <i>Updated July 25 for 1st Sept 2026 implementation</i>	<a href="#">Relationships and sex education (RSE) and health education - GOV.UK</a>
Prevent Duty England and Wales 2015 – Updated September 2023	<a href="#">Prevent duty guidance: England and Wales (2023) - GOV.UK</a>  <b>HM Government Guidance</b> <a href="#">Prevent duty guidance: Guidance for specified authorities in England and Wales (publishing.service.gov.uk)</a>
Safeguarding Learners Vulnerable to Radicalisation Sept 2023	<b>DfE Guidance</b> <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK</a>
Martyn's Law – Terrorism (Protection of Buildings) Act 2025	<a href="#">Martyn's Law: the SIA's new regulatory role - GOV.UK</a>
Martyn's Law – Home Office Fact Sheet	<a href="#">Terrorism (Protection of Premises) Act 2025: factsheets - GOV.UK</a>
DfE Meeting the Digital Standards 2025	<a href="#">Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK</a>
Teaching online safety in schools guidance 2023	<a href="#">Teaching online safety in schools - GOV.UK</a>
NSPCC E-Safety Guidance for Schools March 2022	<a href="#">Online safety (e-safety) and schools   NSPCC Learning</a>

Sharing nudes and semi-nudes: advice for education settings working with children and young people, Updated March 2024 (Non-statutory advice)	<a href="https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/118127/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview">Sharing nudes and semi-nudes: how to respond to an incident (overview) (publishing.service.gov.uk)</a>
Guidance that any child investigated by the police whether in or out of school should have an appropriate adult with them. Updated December 2023	<a href="https://www.gov.uk/guidance/pace-code-c-2019">PACE Code C 2019 - GOV.UK</a>
DfE Guidance – Teachers Misconduct - The prohibition of Teachers – Feb 2022 <i>Advice on factors relating to decisions leading to the prohibition of teachers from</i>	<a href="https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/118127/teacher-misconduct-the-prohibition-of-teachers">Teacher misconduct: the prohibition of teachers (publishing.service.gov.uk)</a>
<i>the teaching profession</i>  Website for reporting a teacher	<a href="https://www.gov.uk/guidance/report-serious-teacher-misconduct">Report serious teacher misconduct - GOV.UK</a>

Sources of additional information:

Countering online conspiracies in schools	<a href="https://www.pearsfoundation.org.uk/research/countering-online-conspiracies-in-schools">The Commission into Countering Online Conspiracy in Schools - Pears Foundation</a>
Education Against Hate Guidance Documents	<a href="https://www.educateagainsthate.org.uk/school-leaders-archives">School Leaders Archives - Educate Against Hate</a>
HM Government Enough Campaign (Violence against Women and Girls)	<a href="https://www.enough.org.uk/guidance-and-resources-for-teachers-and-school-staff">Guidance and resources for teachers and school staff   ENOUGH</a>
The Lucy Faithfull Foundation – ShoreSpace A confidential website service for teenagers worried about theirs or someone else’s sexual thoughts and behaviours.	<a href="https://www.shorespace.org.uk">Shore Space</a>
The Children’s Society – Preventing Child Sexual Exploitation Guidance	<a href="https://www.childrensociety.org.uk/child-protection/preventing-child-sexual-exploitation">Preventing Child Sexual Exploitation   The Children's Society</a>
Centre of Expertise on Child Sexual Abuse – Guidance	<a href="https://www.cecsa.org.uk/resources-for-education-settings">Resources for education settings   CSA Centre</a>

### 3. Relevant Policies

This safeguarding and child protection policy has also been developed by taking account of the following Earlscliffe policies below and should be read in conjunction with them:

- Acceptable use of IT (Pupils)
- Acceptable use of IT (Staff)
- Anti-Bullying Policy (Pupils)
- Attendance Policy
- Behaviour Policy (Pupils)
- Code of Conduct (Staff)
- E-Safety / Online Safety Policy
- Health, safety, and security policy (Staff)
- Lone Working policy (Staff)
- Low Level Concerns Policy (Staff)
- Physical Restraint Policy (Staff)
- Safer Recruitment policy (Staff)
- Trips and Visits Policy (Staff)
- Whistleblowing Policy (Staff)

Any questions regarding this policy should be directed towards the Designated Safeguarding Lead in the first instance, Peter Scargill.

### 4. Key Personnel for Safeguarding and Child Protection

Title	Name	Role	Mobile No	Email
DSL	Peter Scargill	Dep Head Pastoral	07716097487	<a href="mailto:Peterscargill@earlscliffe.co.uk">Peterscargill@earlscliffe.co.uk</a>
DDSL	Maria Cordell	School Nurse - Mental Health	07515884467	<a href="mailto:Mariacordell@earlscliffe.co.uk">Mariacordell@earlscliffe.co.uk</a>
DDSL	Karen Taylor	Boarding HM 26GG	07955314179	<a href="mailto:Karentaylor@earlscliffe.co.uk">Karentaylor@earlscliffe.co.uk</a>
	Paul Ludlow	Safeguarding Gov	07584012130	<a href="mailto:Paul.ludlow@dukeseducation.com">Paul.ludlow@dukeseducation.com</a>
	Aatif Hassan	Dukes Chairman	020 3696 5300	<a href="mailto:Aatif.hassan@dukeseducation.com">Aatif.hassan@dukeseducation.com</a>

## 5. Key External Agencies, Services and Professionals' Contact Details

<b>Kent Safeguarding Multi Agency Partnership</b>	
Address:	Room 2.71, Sessions House, Maidstone, ME14 1XQ
Telephone/Mobile:	03000 42 11 26
Email:	kscmp@kent.gov.uk
<i>For Kent-wide safeguarding procedures, guidance and resources; not for individual child referrals</i>	
<b>Kent MASH / Children's Contact Team / Early Help</b>	
Address:	Kroner House, Eurogate Business Park, Ashford, TN24 8XU
Telephone/Mobile:	03000 41 11 11 / 03000 41 91 91 (Out of hours)
Email:	<a href="mailto:social.services@kent.gov.uk">social.services@kent.gov.uk</a> / <a href="mailto:ShepwayEarlyHelp@kent.gov.uk">ShepwayEarlyHelp@kent.gov.uk</a>
<i>For making safeguarding referrals / requesting social care support and Early Help; use out-of-hours number for emergencies outside office hours</i>	
<b>Kent Local Authority Designated Officer (LADO) / Child Protection Lead Officer</b>	
Address:	Kroner House, Eurogate Business Park, Ashford, TN24 8XU
Telephone/Mobile:	03000 410 888
Email:	kentchildrenslado@kent.gov.uk
<i>For allegations against an adult working/volunteering with children; professional referrals are submitted via the Kent Integrated Children's Services portal; parents/carers referral form can be emailed to <a href="mailto:lesasenquiries@kent.gov.uk">lesasenquiries@kent.gov.uk</a></i>	
<b>Kent Local Authority Online Safety Contact Officer</b>	
Name:	LESAS Online Safety Team
Telephone/Mobile:	LESAS enquiry form (via KELSI) for strategic online safety advice/training
Email:	LESAS enquiry form (via KELSI)
<i>For strategic education online safety advice (not related to an individual child); if an online safety concern relates to the safety or welfare of a child, follow KSCMP guidance and contact Kent integrated front door as appropriate.</i>	
<b>Kent Local Authority Education Safeguarding Lead Officers / Children's Service Managers</b>	
Name:	No Specific Named Person
Telephone/Mobile:	03000 41 11 11 / 03000 41 91 91 (Out of hours)
Email:	lesasenquiries@kent.gov.uk
<i>For general/strategic education safeguarding or online safety advice (not about an individual child) use the LESAS enquiry form; for individual child welfare concerns use the</i>	
<b>Kent Local Authority Prevent Education Officer</b>	
Name:	Rachel Murray
Telephone/Mobile:	03000 412 431
Email:	rachel.murray@kent.gov.uk
<i>For Prevent Duty support for education settings across South &amp; East Kent</i>	

<b>Police Counterterrorism / Prevent Officer</b>	
Name:	No Specific Named Person
Telephone/Mobile:	0800 011 3764 (ACT Early Support Line) 03000 41 41 41 (Kent & Medway Prevent Team) 0800 789 321 (Anti-Terrorism Hotline)
Email:	prevent@kent.gov.uk (advice before referral) preventreferrals@kent.police.uk (submit referral form)
<i>For concerns about radicalisation: seek advice via ACT Early / Kent &amp; Medway Prevent Team; for a Prevent referral submit the National Prevent Referral Form by email; for suspicious terrorist activity</i>	
<b>Non-emergency Advice</b>	
Name:	The Department for Education – telephone helpline non-emergency advice for staff and governors for extremism
Telephone/Mobile:	020 7340 7264
Email:	Counter-extremism@education.gsi.gov.uk
<i>For non-emergency advice and support for education staff/governors about extremism concerns. Not for emergencies 999 and not for immediate child welfare concerns.</i>	

<b>Advice Lines for Parents / Carers / Pupils</b>	
Samaritans (24/7 listening support)	116 123 jo@samaritans.org
Shout (24/7 crisis text support)	Text: SHOUT to 85258
PAPYRUS HOPELINE247 (suicide prevention for under 35s / concerned)	0800 068 4141
YoungMinds Parents Helpline (support for parents/carers worried about a child's mental health)	0808 802 5544  webchat available
Kooth (free online wellbeing support/counselling for 10–25 in Kent)	Online: Kooth.com
Release the Pressure (Kent & Medway mental health helpline, 24/7)	0800 107 0160 releasethepressure@rethink.org
National Domestic Abuse Helpline (Refuge, freephone 24/7)	0808 2000 247
Karma Nirvana (Honour Based Abuse / forced marriage support)	0800 5999 247
NSPCC FGM Helpline (FGM advice/support)	0800 028 3550
Crimestoppers (anonymous reporting)	0800 555 111
Professionals Online Safety Helpline (UK Safer Internet)	0344 381 4772
NSPCC Whistleblowing Advice Line (concerns about how safeguarding is handled in a workplace)	0800 028 0285  help@nspcc.org.uk

Stop It Now (Lucy Faithfull Foundation – concerns about sexual behaviour / preventing child sexual abuse)	0808 1000 900  contactus.stopitnow.org.uk
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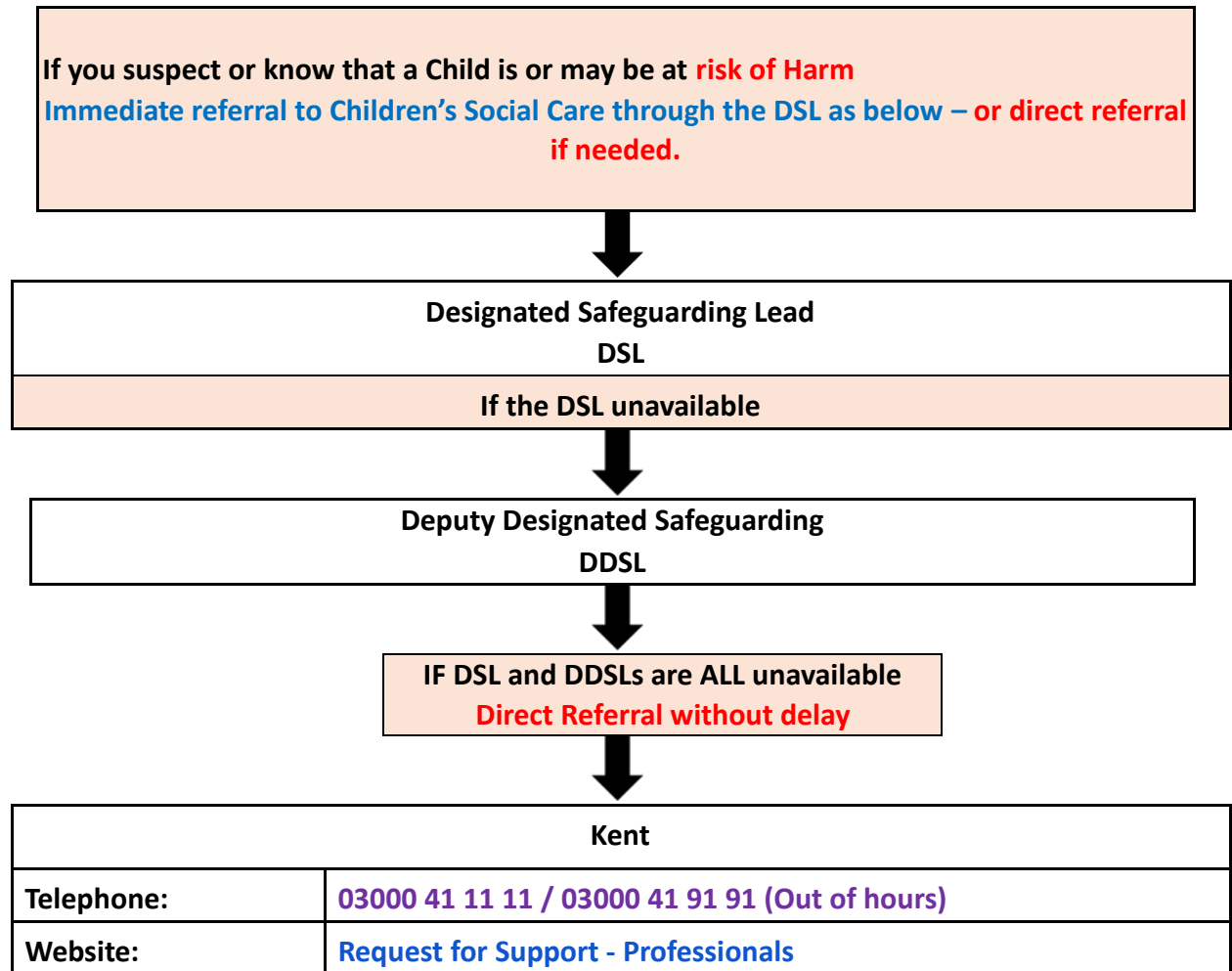
*These services give pupils and families confidential, specialist support (often 24/7) when they need advice, emotional support, or a safe way to disclose concerns—especially if they feel unable to speak to school staff immediately. They also provide independent routes for reporting and guidance (e.g., domestic abuse, honour-based abuse, online exploitation, anonymous reporting), and can help people understand next steps and stay safe. In an emergency or immediate danger, call 999; for urgent safeguarding concerns about a child’s welfare, use the local authority referral route (e.g., Integrated Front Door/MASH).*

**\*\*Please remember anyone can make a referral directly to children’s social care, the Local Authority Designated Officer or police if they believe that a child is at risk or may be at risk of significant harm. \*\***

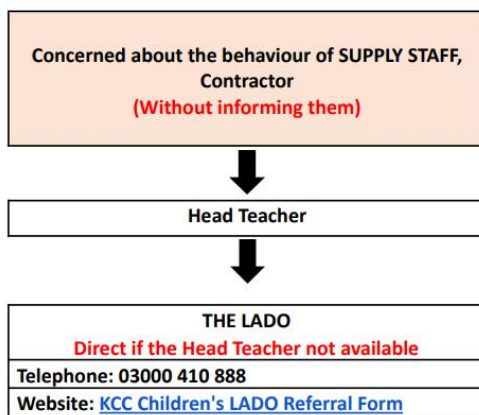
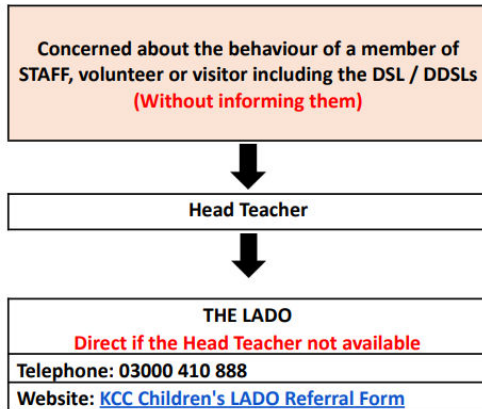
If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible or in their absence the Head Teacher or the Safeguarding Governor.

## 6. Safeguarding Reporting Summary

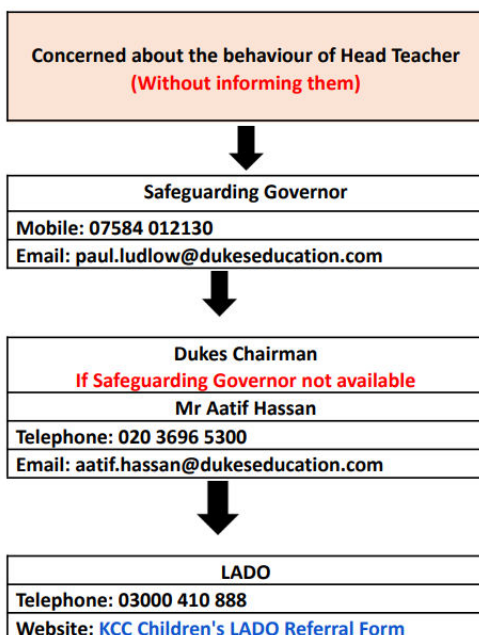
In all circumstances, no investigation will take place by anyone at the school until advice has been sought from the Children’s Social Care Team or the LADO, who will advise the DSL/DDSL/Head teacher on next steps to take.

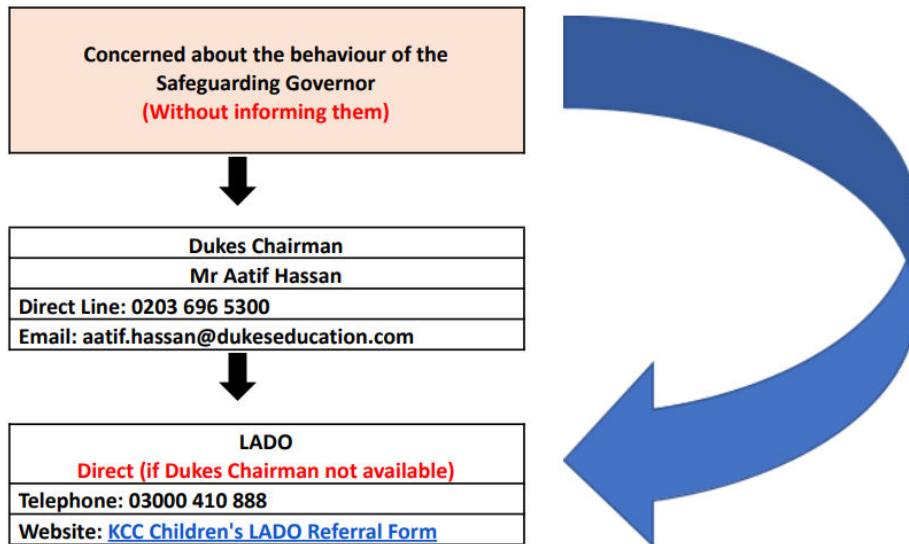


The LADO can also be contacted if unable to get through to the Police



The Head Teacher will also contact the proprietor of the Supply Agency or Contractor, after advice from the LADO  
Advice from LADO to either follow safeguarding procedures or our own low-level concerns policy





In all cases, staff and parents are advised that phone contact will be the first point of communication to report any concerns.

Email communication is only to provide further detail if required and will not be used to believe any concern has been passed on.

If the person is not directly contacted and is unable to be found, then staff / parents will need to make further contact with key personnel on the flow charts or Children’s Social Care Team and / or LADO directly.

## 7. Aims

The aims of this Safeguarding and Child Protection Policy are to ensure that Earlscliffe provides a safe, supportive and protective environment in which all students can thrive. Safeguarding is embedded within the ethos, culture and daily practice of the school, and these aims reflect our commitment to placing the welfare of the child at the centre of all decision-making.

Specifically, the school aims to:

- **Promote a strong safeguarding culture** in which all members of the school community understand that safeguarding is everyone's responsibility, concerns are taken seriously, and students feel safe, listened to and supported.
- **Ensure the safety and wellbeing of all students** by protecting them from abuse, neglect, exploitation and harm, both within and beyond the school environment, including online.
- **Adopt a child-centred approach** in all safeguarding matters, ensuring that the best interests of the student are always paramount and guide all actions and decisions.
- **Enable early identification and intervention** by ensuring that staff are vigilant, well-trained and confident in recognising the signs of abuse or vulnerability and in responding appropriately and without delay.
- **Provide clear, effective and well-understood procedures** for reporting, recording and responding to safeguarding concerns, including those relating to child-on-child abuse, online safety and extra-familial harm.
- **Support vulnerable students**, including those with special educational needs and disabilities (SEND), those experiencing mental health difficulties, international students, and those living in boarding, recognising that these groups may face additional barriers to disclosure.
- **Promote students' understanding of how to keep themselves safe**, including through a planned and age-appropriate programme of PSHE and RSE, which addresses relationships, consent, online safety, and personal wellbeing.
- **Ensure all staff are appropriately recruited, trained and supported**, and that they understand their safeguarding responsibilities, including maintaining professional boundaries and acting in accordance with the staff code of conduct.
- **Foster open communication and a culture of professional challenge**, where staff feel confident to raise concerns about poor or unsafe practice and where such concerns are addressed appropriately and sensitively.
- **Work effectively in partnership with parents, carers and external agencies**, including children's social care, the police and health services, to safeguard and promote the welfare of students.

- **Maintain robust systems for monitoring, recording and reviewing safeguarding concerns**, ensuring that information is shared appropriately and that action is taken in a timely and proportionate manner.
- **Ensure strong governance and oversight of safeguarding**, with the governing body and proprietor holding school leaders to account for the effectiveness of safeguarding arrangements and promoting continuous improvement.
- **Provide a safe boarding environment**, recognising the extended duty of care required in a residential setting and ensuring that safeguarding arrangements operate effectively at all times, including outside normal school hours.

Earlscliffe seeks to create an environment in which safeguarding is not only a duty but a lived commitment, ensuring that every student feels safe, respected and able to succeed.

## 8. Key Safeguarding Principles

Safeguarding at Earlscliffe is underpinned by the following key principles, which guide all actions, decisions and behaviours across the school community:

- **The welfare of the child is paramount.**  
The needs, safety and wellbeing of the student always take precedence over the interests of adults, including parents, carers and the institution itself.
- **Safeguarding is everyone's responsibility.**  
Every adult working in or on behalf of the school has a duty to be vigilant, to recognise concerns and to take appropriate action. No concern is too small to report.
- **A child-centred approach is essential.**  
All safeguarding practice must reflect the voice, wishes and lived experience of the student, recognising that each individual may respond differently to harm or risk.
- **It could happen here.**  
Staff understand that abuse and neglect can occur in any setting. A culture of professional curiosity and respectful challenge is essential in identifying and responding to concerns.
- **Early identification and intervention are critical.**  
Recognising concerns at the earliest possible stage and acting promptly can prevent escalation and reduce harm.
- **Students must feel safe to speak.**  
The school fosters an environment in which students feel confident to raise concerns, knowing they will be listened to, taken seriously and supported.
- **Safeguarding extends beyond the school gates.**  
Risks to students may arise in the home, the community, in boarding environments or online. Staff consider the wider context in which students live, including extra-familial harm.

- **Effective information sharing is essential.**  
Safeguarding concerns must be shared appropriately and without delay. Fears about data protection must never prevent the sharing of information necessary to protect a child.
- **Partnership working strengthens safeguarding.**  
The school works collaboratively with parents, carers and external agencies, recognising that safeguarding is most effective when there is clear communication and shared responsibility.
- **All concerns must be acted upon.**  
Staff must never assume that someone else will take action. If a concern arises, it must be reported immediately in accordance with school procedures.
- **A culture of openness and accountability is vital.**  
Staff must feel confident to raise concerns about the behaviour of adults, including colleagues and senior leaders, and know that these concerns will be addressed appropriately.
- **Safeguarding is continuous and reflective.**  
The school is committed to ongoing training, review and improvement of safeguarding practice to ensure it remains effective and responsive to emerging risks.

These principles ensure that safeguarding at Earlscliffe is not only a matter of policy, but a shared commitment embedded in the daily life of the school.

## 9. SAFEGUARDING AT EARLSCLIFFE – QUICK REFERENCE GUIDE

If you have a concern about a student's safety or welfare:

### ACT IMMEDIATELY – DO NOT DELAY

1. Report your concern to the DSL or a Deputy DSL in person or by phone.
2. If they are unavailable, make a direct referral to Children's Social Care or the Police.
3. Do not investigate the concern yourself.
4. Record the concern as soon as possible on CPOMS.

### Key Contacts

<b>Designated Safeguarding Lead (DSL)</b> Peter Scargill ☎ 07716 097487 ✉ <a href="mailto:peterscargill@earlscliffe.co.uk">peterscargill@earlscliffe.co.uk</a> <b>Deputy DSLs</b> (See full policy for contact details)	<b>Kent Children's Social Care (MASH)</b> ☎ 03000 41 11 11 ☎ 03000 41 91 91 (Out of hours) <b>Police</b> ☎ 999 (emergency)   101 (non-emergency)
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If a student makes a disclosure:

- Listen carefully and take them seriously
- Do not promise confidentiality
- Do not ask leading questions
- Reassure them they have done the right thing
- Report immediately to the DSL
- Record accurately using the student's own words where possible

If you have a concern about a member of staff:

- Report to the Head Teacher immediately
- If the concern is about the Head Teacher, report to the Safeguarding Governor
- You may contact the LADO directly if necessary **LADO (Kent)** ☎ 03000 410 888

Remember:

- Safeguarding is everyone's responsibility
- It could happen here
- No concern is too small
- Always act in the best interests of the student
- Never assume someone else will take action

Key Principles

- The welfare of the child is paramount
- Act immediately – delays can place students at risk
- Share concerns appropriately – safeguarding overrides data protection concerns
- Maintain professional curiosity – if something doesn't feel right, follow it up

In an emergency: If a student is in immediate danger, call 999

Out of Hours (Boarding Context) Safeguarding responsibilities apply 24 hours a day.  
Boarding staff must follow the same procedures and ensure concerns are escalated immediately.

**Every adult at Earlscliffe has a duty to safeguard and protect students.**

## 10. The Designated Safeguarding Lead

The school has appointed a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), The DSL and some of the DDSLs are members of the Senior Leadership Team and have the necessary status, training and authority to be responsible for matters relating to the welfare of pupils, including child protection.

### **Responsibilities of the DSL**

The main responsibilities of the DSL are as detailed in KCSIE Annex C, but are also detailed below:

- To promote a culture of safeguarding so the welfare and best interests of children are embedded within all the school's processes and procedures.
- To co-ordinate and monitor safeguarding, being the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies.
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection.
- Immediately upon the receipt of any concerns, to act upon the report.
- To liaise with Kent Safeguarding Children's Multi-Agency Partnership (KSCMP) and other neighbouring Children's Services departments.
- To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To ensure the safeguarding governor is informed about safeguarding concerns including any referrals.
- To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- To be responsible for safeguarding and child protection procedures and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
- To provide a systematic means of monitoring and supporting the young people known or thought to be at risk of harm or where there are ongoing concerns at school as well as outside or inside the child's home.
- To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked after children.
  
- To maintain a regular training programme for all members of staff and volunteers in line with advice from KSCMP.
- To ensure all new staff receive induction training in safeguarding and understand their responsibilities as well as have received a copy of KCSIE Part 1 and / or Annex A.

- To ensure that all staff and governors have confirmed that they have been provided with, read and understood a copy of the Safeguarding Policy (i.e., this document), KCSIE Part 1, Annex A as well as Annex B if they lead or manage or work directly with children have read and understood them.
- To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- To ensure that when children or young people leave that any child protection information is copied for the new educational provider within 5 days and transferred securely and separately from the main file.
- To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new child / pupil joining.
- To monitor the confidentiality, keeping and storage of records in relation to safeguarding. Earlscliffe uses CPOMS for all its safeguarding records. Access is restricted to the Head Teacher, DSL, and Deputy DSLs.
- To ensure the Safeguarding Policy is reviewed annually in conjunction with the Head Teacher, and the Board of Governors / Proprietor, such review to include its effectiveness in practice.
- To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- To be responsible for overseeing online safety in the school with the support of the IT manager. The DSL will have responsibility for child protection processes (including online safety and understanding the filtering and monitoring systems and processes in place).
- To ensure the Safeguarding Policy is available to parents / carers, published on the Earlscliffe website.
- To ensure that “Safeguarding” is a standing item on the agenda for, and minutes of, staff meetings. This is to ensure that all members of staff will be aware that there is a safeguarding concern about that child or young person, with detailed information only shared on a ‘need to know’ basis. It also provides those present with an opportunity to raise any general safeguarding issues.
- To ensure a termly report is sent to the Safeguarding Governor to be presented at the full termly governors meeting and the annual Safeguarding Audit is presented to the Governing Board.
- Be aware of the requirement that children investigated by the police whether the police are attending in school or interviewing the child at a police station, that an appropriate adult present. (Annexe C, KCSIE 2025).

## 11. The Deputy DSLs

The Deputy DSLs is/are trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children / young people, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

During term time, the DSL and/or the Deputy DSL s are available during normal working hours, either on site, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns.

## 12. Responsibilities of the Staff

- To provide a safe and supportive learning environment
- To read and understand, Part 1 of Keeping Children Safe in Education and Annex A, as well as Annex B if they lead or manage or work directly with children.
- To read and understand the School's Safeguarding Policy and Procedures i.e. this document.
- To adhere to the Staff Code of Conduct.
- To undertake regular safeguarding training, at least annually.
- To be alert to the signs of abuse and neglect, including child-on-child abuse, and to report any concerns to the DSL immediately.
- To be aware that even if there are no reports of child-on-child, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To help pupils understand how to keep themselves safe and manage risk.
- To be alert to absenteeism of any students and inform the DSL of any concerns.
- To consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).
- To report to the Head Teacher any concerns about the conduct of adults, including low level concerns (this includes behaviour outside the school that might indicate an individual is unsuitable to work with children)

### 13. Responsibilities of the Head Teacher

- To promote an overarching culture of safeguarding so the welfare of the students is embedded within all the school's processes and procedures operating with the best interests of the child at their heart.
- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the school policy and procedures follow statutory guidance.
- To ensure that KCSIE Part 1 (including Annex A) and our Safeguarding Policy are understood and implemented effectively by all staff, whether or not they directly work with children.
- To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out their roles effectively.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the Whistleblowing procedures.
- To ensure students are taught about keeping safe, including online
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns.
- To seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To undertake training on safer recruitment processes at regular intervals
- To monitor the effectiveness of this policy and its procedures in liaison with the Safeguarding Governor and SLT and to remedy any deficiencies immediately.

### 14. Responsibilities of the Board of Governors and Proprietor

- To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- To ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.
- To create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.
- To ensure policies, procedures and training in the school is effective and comply with the law at all times.
- To ensure there is a nominated governor for safeguarding, who takes leadership responsibility at board level for all safeguarding matters.

- To ensure the nominated governor has the required knowledge, skills and expertise to take leadership responsibility for the school safeguarding arrangements.
- To ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead.
- To ensure there is an effective Safeguarding Policy in place, which is consistent with KCSIE (Sept 2025), Working Together to Safeguarding Children (2026) and the requirements of the Kent Safeguarding Children's Multi-Agency Partnership (KSCMP).
- To ensure the policy is available publicly on the school's website.
- To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.
- To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Anti-bullying Policy, Relationships & Sex Education Policy.
- To ensure that school holds at least two emergency contact numbers for each student.
- To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in the school's Single Central Record (SCR).
- To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes.
- As part of this process, the Board of Governors will ensure that the school undertakes regular monitoring of filtering systems in place and regularly reviews their effectiveness and that there is a named governor for On-line safety for meeting its duties under the DFE Digital Standards.
- The Board of Governors should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- A review of the Safeguarding Policy at least annually (and in the case of a serious incident), including an update and review of the effectiveness of procedures and their implementation. The annual review of safeguarding forms part of the summer term Governors' Review Meeting. A termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board by the DSL or the Head.
- The Governing Body and proprietor should ensure that ALL governors receive appropriate safeguarding and child protection (including online) training at induction. This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

- The Governing body should ensure that all staff undergo safeguarding and child protection training. Induction and training should be in line with any advice from the safeguarding partners.
- The Board of Governors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their multi-agency safeguarding arrangements.

## 15. Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school environment. These can occur between children both within and beyond the school setting, in the home, in the community and online.

All staff, including the designated safeguarding lead (DSL) and any deputies, should consider the wider context in which such incidents and/or behaviours occur. This includes recognising wider environmental factors in a child's life that may pose a risk to their safety and welfare. These contextual factors should be clearly identified, documented and considered when assessing any safeguarding concern.

Children's Social Care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

### Extra-familial Harm

All staff, but especially the DSL and deputy DSLs should consider whether a child may be at risk of abuse or exploitation outside of their family environment. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to: sexual 14 September 2025 JJM abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

## 16. Teaching Students How to Keep Safe

The governing body ensures that children are taught about how to keep themselves and others safe, including online. The school recognises that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).

The school pays particular attention to its practices, especially through the PHSE programme, which is fully inclusive and differentiated to help children adjust their behaviours, both inside and outside school and online, to reduce risks (particularly online), build resilience (including to radicalisation) to protect themselves and their peers, foster healthy and

respectful relationships with others and provide information about who they should turn to for help. The school has regard to the statutory DfE guidance which can be found here.

The school recognises the crucial role that it plays in preventative education and that this is most effective in the context of a whole-school approach which prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The school recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed. Students are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through RSHE and PSHE education.

Sessions on relationships and sex education include amongst other topics:

- 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, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support;
- what constitutes sexual harassment and sexual violence and why these are always unacceptable;
- sharing nudes and semi-nudes;
- porn; and
- sexual bullying as well as
- sessions on online safety, where children are taught to keep themselves safe online and the risks posed by adults/young people, who use the internet and social media to bully, groom, abuse or radicalise.

The safe use of technology and the internet is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities.

Regarding the latter, the governing body of the school is aware of the importance of and has ensured that appropriate monitoring systems and filters are in place to safeguard children from potentially harmful and inappropriate material online when using the school's network and that these should not lead to unreasonable restrictions as to what students can be taught regarding online teaching and safeguarding. The school keeps in regular contact with parents and carers to reinforce the importance of students being safe online.

Additionally, tutors work with their charges on developing resilience to the challenges the latter will encounter in life, including mental health problems or the possibility of radicalisation.

Students are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled.

The school also runs student focussed groups where students are encouraged to speak with pastoral staff and help guide policy on gender equality and mutual respect. Student voice is sought through a range of platforms (including school council, the food-committee and regular surveys.

### **Reporting Concerns (Students)**

Students can report any concerns directly to staff in person or email. This can be done anonymously.

Posters are displayed in each classroom and communal area with contact details of safeguarding school staff and external organisations.

### **17. Children with special educational needs and disabilities (SEND)**

Staff are made aware that children with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse including those with physical health issues. Such children are also more prone to peer group isolation or bullying.

Staff will be aware that:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration as it might be due to abuse taking or have taken place.
- Children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs.
- Communication barriers may exist and difficulties in overcoming these barriers.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND in the school.

We will consider extra pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place.

## 18. What to do when there are concerns or if a child makes a disclosure

It is important that students receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child (student)
- Keep clear written records
- Listen to the views of the student
- Reassess concerns if the student's situation does not improve
- Share information quickly and challenge inaction

Staff see students regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive.

Staff should be aware that younger pupils may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns.

Concerns may also be raised about a parent/carer's interaction with a student or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

Appendix 1 of this policy gives details of some of the types of abuse and safeguarding issues with which staff should be familiar.

## 19. Procedures if staff have a concern about a student

If a member of staff is concerned about a student the matter should be referred immediately to the DSL, or the Deputy in the DSL's absence.

Staff may speak directly to the DSL or Deputy DSL first to discuss their concerns about a student or may enter their concern straight on to CPOMS (the school's management system for safeguarding) for attention by the DSL.

In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day. (also see later section on recording concerns)

In all instances, a written record must be made by the member of staff on CPOMS, which all staff have access to.

Any member of staff who cannot access CPOMS for any reason must always contact the DSL directly, and without delay.

## 20. Procedures for staff if a student discloses information

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

The member of staff should:

- Listen carefully and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. When the student has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.
- Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim will never be given the impression by our staff that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Our staff will explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them.
- All staff should be aware that young people 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 harmful. For example, a young person may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication
- Do not promise confidentiality. Explain that you have to make sure that the student is safe, and you will need to ask other staff to help you to do this.
- Do not cross question the student. You must not ask leading questions, that is, a question which suggests its own answer. Let the student tell you what he or she wants to and no more. The student may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Be prepared to follow up with the student, but only in conjunction with advice from the DSL.
- Be aware that students may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Do not attempt any examination or remove a student's clothes to look further at an injury. Under no circumstances should photographs be taken of a student's injury, even if requested by a parent / carer so they can show to their child's doctor.

- If a student wants to show you his or her injuries, please try and insist that this must wait for a health professional to make an assessment. No student should be asked to undress to show their injuries to a member of staff.
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.

If a concern or disclosure involves technology or online images staff must follow the specific advice in this policy.

## 21. Mechanisms for students to report concerns

The school has a strong pastoral system and promotes an ethos where students feel safe to share information about anything that is worrying them.

The Student Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

There is an annual pupil survey conducted and results carefully considered.

There are posters around school saying who students can talk to and students are reminded regularly in forums (assemblies) and PSHE lessons on who they can speak to and that we are all here to help.

## 22. Support for staff

The school recognises that staff who have become involved with a student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

The school will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 23. Recording Safeguarding Concerns

Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight, and respectful challenge, as well as effective recording, reporting and monitoring systems.

All staff have an appropriate level of access to CPOMS which enables them to record concerns. The DSL and Deputy DSL have full access to enable them to record actions and store all safeguarding records securely.

All safeguarding concerns must be recorded on CPOMS, the school's management system for safeguarding.

If the DSL is not available for any reason the Deputy DSLs must be contacted to deal with the concern initially.

With regard to any conversations directly with a student or overheard, staff must keep a written record of the conversation and concerns arising.

The record should include the date, time, and place of the conversation, who was present and what was said by the student. The record should use names, not initials, for all references to people.

The record should be specific. Record actual behaviour and language used by a student rather than more vague terms such as inappropriate language/behaviour.

Staff should make the record as soon as possible after speaking to the student, so the student is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the student's own words.

The record should contain facts and information only, taking care to avoid personal opinion.

Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.

If more than one member of staff is present when a student discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on CPOMS.

The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.

It is important to record all concerns regarding the welfare of students, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.

Staff must not investigate further or speak to parents or other staff. They must contact the DSL who will then determine the next course of action.

## 24. DSL Action on receipt of a concern about a student

On receipt of the safeguarding report, the DSL must record the decisions made and action taken. Action will depend on the nature of the concern. It may include one or more of the following:

- Monitoring the student in school
- A discussion with parents
- Early help intervention from the school and/or another agency
- Referral to Children's Services
- Referral to the LADO
- Report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken.

If the student's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

## 25. Preserving evidence

All evidence (which could include a student's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.

If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.

Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.

If the imagery has already been viewed by accident (e.g., if a student has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.

Do not delete the imagery or ask the student to delete it.

Do not ask the student(s) involved in the incident to disclose information regarding the imagery.

Do not share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any student(s) involved.

Do explain that you need to report it and reassure them that they will receive support and help.

Report the matter to the DSL immediately.

Also see DfE Searching Screening and Confiscation Advice for schools and the UKCIS Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared.

## 26. Child protection records

Safeguarding records are kept securely on CPOMS.

There is a clear, detailed chronology for each student where concerns have been raised.

Written records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.

If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.

All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing on CPOMS.

The KSCMP has its own referral form which must be completed if a formal referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.

Minutes of any case conferences or discussions with social workers or other professionals involved with the student will be retained in the student's file and will be scanned into CPOMS.

Any new concern or information about a student who has active involvement with Children's Services must be passed to the student's allocated social worker without delay.

Any new concern or information about a student who has had previous involvement with Children's Services must be passed to Children's Services without delay.

If a student moves to another school, all child protection records are transferred securely, within 5 days, to the DSL at the new school and a receipt is obtained confirming they have been received. Parental permission is not required for records to be shared with the new school.

On a case-by-case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the student's needs and can have any support in place when the student arrives.

Safeguarding records will be requested from previous schools for any new students joining the school.

## 27. Information sharing

Information will be shared according to the HM Government guidance Information Sharing (July 2018.)

The Data Protection Act 2018 (DPA) 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.

The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils. The guidance states that the information shared should be:

- Necessary and proportionate: Any information shared must be proportionate to the need and level of risk.
- Relevant: Only information that is relevant to the purposes should be shared with those who need it.
- Adequate: Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- Accurate: Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- Timely: Information should be shared in a timely fashion to reduce the risk of harm.
- Secure: Wherever possible, information should be shared in an appropriate, secure way.
- Record: Information sharing decisions should be recorded whether or not the decision is taken to share.

Practitioners may share information, without consent when there is a good reason to do so, and the sharing of that information will enhance the safeguarding of that child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent and if to gain consent would place a child at risk.

## 28. Early Help

Early Help means providing help and to meet the needs of children and support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment will be arranged. Chapter 1 of Working Together to Safeguard Children (Department for Education, September 2018/updated 2026) provides detailed guidance on the early help process.

Additional support systems in school may form part of early help strategies e.g. additional pastoral support, school mentors, support from a counsellor and should feed into Local Authority early help measures as required.

Evidence is kept of all early help interventions.

Any student may benefit from early help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a student who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health and care plan).
- Is a young carer.
- Is frequently missing/goes missing from care or home.
- Is misusing drugs or alcohol.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse. - Has returned home to their family from care.

The school also has access to other counselling and support services if needed.

Staff will be trained to be able to identify children who:

- Would benefit from early help.
- Have unexplained or persistent absence from education.

## 29. Safer recruitment - Staff

The school follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and Disqualification under the Childcare Act 2006 (September 2018).

Please also see our safer recruitment policy. All staff are checked as to their suitability.

These checks include:

- The taking up of references.
- Verification of identity.
- Verification of right to work in the UK.
- Where appropriate, verification of qualifications.
- Where appropriate, an overseas criminal record / police clearance check (as applicable to the country concerned)
- A satisfactory enhanced check with the Disclosure & Barring Service (DBS), including a Barred List check for staff engaged in regulated activity

- A self-declaration to ensure compliance with disqualification regulations made under the Childcare Act 2006.
- For teachers, verification of Qualified Teacher Status (QTS), and the completion of teacher induction or probation.
- For staff engaged in teaching duties, a check that the teacher is not subject to a prohibition order issued by the Secretary of State.
- Where appropriate, a check that there is no teacher prohibition order issued by any overseas professional authority.
- Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school (Section 128).
- A medical fitness questionnaire and / or medical self-declaration.

In some circumstances, and as long as specific criteria are met, a newly recruited member of staff may, if closely supervised, begin work without an enhanced DBS certificate or overseas police clearance. The conditions applicable are set out in the Recruitment Policy and include a requirement for all other checks to be completed, including a Barred List check. The Head Teacher will also complete a DBS Risk Assessment reviewed fortnightly until the DBS certificate is received and, if applicable, the overseas police clearance is also received.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.

In addition, as part of the shortlisting process our school will carry out an online search as part of their due diligence on any shortlisted candidates.

This may help identify any incidents or issues that have happened, and are publicly available online, which our organisation might want to explore with the applicant at interview.

Our human resources department will make known of this due diligence by placing this intention to research publicly available online material within the advert, candidate pack and application form so that it is well known before any short-listing takes place that this will occur.

### 30. Safer recruitment - Governors

The majority of our governors are employed centrally by Dukes Education and therefore operate a model of “professional governance”.

Appropriate recruitment checks will be undertaken as standard for anyone appointed to a management role with Dukes Education to ensure that they are fit and proper to be part of the leadership and management. Dukes Education will provide a letter of assurance to our organisation that all suitability checks have been carried out prior to commencement of

their governor role. Our organisation will further check Identity and DBS (enhanced with barred if applicable) prior to their first governor meeting.

Any external governor will have full suitability checks undertaken including checks that they are also not barred because of being subject to a section 128 direction.

This information will be recorded on the single central record.

### 31. Visiting Speakers

Visiting speakers are always vetted and staff must obtain permission from the Head Teacher for any speakers to visit the school.

On arrival, photographic evidence will be asked to check their identification and they will be asked to sign in the signing-in book at reception. As they will be always supervised, a DBS or barred list check will not be required, unless it is deemed, they may be undertaking regulated activity.

Information on any online research undertaken, references received (written or verbal on their suitability) etc must be collated in the school visiting speakers log.

This log will contain date of visit, company name, person's name, purpose of visit, ID checked references okay, online research undertaken, visit approved by and risk assessment checked if activity being undertaken requires a review.

Suitable online research might include a review of the visiting speaker's website or company information held at companies house, news articles of their visits to other organisations, comments made on [www.mums.net](http://www.mums.net) and should be limited to the suitability of them to present /undertake tasks to the students in the school.

Verbal references from other educational establishments or persons known to the visiting speaker will also be recorded in the visiting speaker's log / file.

### 32. Staff Induction

The DSL is responsible for ensuring that all new members of staff and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction.

This includes:

- Keeping Children Safe in Education, Part 1 and Annex A. (and Annex B if they work directly with children)

- The identities and roles of the DSL and DDSL safeguarding team, including safeguarding governor.
- Safeguarding Policy - Staff Code of Conduct - Acceptable Use Policy.
- Whistleblowing Policy
- Low Level Concerns Policy
- Behaviour Policy
- Anti-bullying Policy
- Prevent training
- Procedures on managing children who go missing from education
- How to report concerns through CPOMS

### 33. Staff Training

All staff are required to read, at least annually, the Safeguarding Policy (i.e this policy) and the Staff Code of Conduct and must confirm that they have done so.

All staff are required to read and understand the guidance for staff in Part 1 and Annex A of KCSIE and confirm that they have done so. Annex A is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor thinks it will provide a better basis for those staff to promote the welfare of and safeguard children.

Every member of staff receives comprehensive training in safeguarding (including on-line safety) at least every three years. Refresher training is provided annually at the start of the academic year and on specific issues through the year as required.

All staff are trained in how to listen, respond to and report any disclosures including those which involve child-on-child sexual violence or sexual harassment.

Induction training for staff will be in line with any advice from the organisation's safeguarding partners.

### 34. DSL and DDSL(s) Training

The DSL and Deputy DSL undergo training at a minimum every two years, which includes training in inter-agency working in line with Annex C of KCSIE. They have updates, at least annually, on specific issues as required.

### 35. Governor Training

The Board of Governors will ensure that governors receive appropriate safeguarding and child protection (including online) training at induction.

The governor responsible for safeguarding has received safeguarding training specifically for governors and undertakes refresher training every two years, as a minimum.

## 36. Filtering and Monitoring Systems

In line with the Department for Education published filtering and monitoring standards, the school will:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs. Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools in meeting this standard.

Our organisation will ensure that our leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

Our Governing Body will consider the number of and age range of our children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

## 37. Staff Code of Conduct

The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of all adults in the school. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by pupils or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

## 38. Whistleblowing

It is recognised that pupils cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, which may include the attitude or actions of colleagues. All members of the school community have a duty to protect children and should they have concerns they must make these concerns known to the Head Teacher.

Please also see our Whistleblowing Policy and advice on low-level concerns in section 43

## 39. Allegations against staff

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors).

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the students, and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in Part 4 of KCSIE and the procedures of KENT Safeguarding Children's Multi-Agency Partnership (KSCMP).

Allegations that might indicate that a person is unsuitable to work with children are where a person 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.

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the school, regardless of whether the school, is where the abuse is alleged to have taken place and regardless of whether it involves students at the school.

Please note that all other concerns about members of staff should be reported through the organisation's Whistleblowing Policy and / or Low-Level Concerns Policy.

If in any doubt, please speak with the Head Teacher in the first instance.

#### 40. Procedures & Informing the Local Authority Designated Officer (LADO)

If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police MUST be made immediately.

An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO, who will advise on the next steps to be taken.

Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.

There are two aspects to consider when an allegation is made:

- Look after the welfare of the child: the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
- Investigate and support the person subject to the allegation: the case manager (usually the Head Teacher, unless the Head Teacher is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The school aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.

The Head Teacher will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a student has made an allegation, a written note of what the student has said will be made by the member of staff to whom the student made the allegation.

The Head Teacher will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.

Any allegation against employed staff or volunteers, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.

An initial assessment of any allegation referred will be made by the LADO and the Head Teacher. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary or low-level concerns procedures.

Where the initial discussion leads to no further action, the case manager and the LADO should:

- Record the decision and justification for it; and
- Agree on what information should be put in writing to the individual concerned and by whom.

Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Head Teacher. If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.

In the case of a referral and investigation, the Head Teacher must ensure, before contacting any interested parties, that there is no objection by the investigating agencies. Where there are no objections from the investigating agencies, the Head Teacher will:

- Inform the person making the allegation and explain the likely course of action
- Ensure the parents of the student(s) who is the alleged victim have been informed about the allegation and the likely course of action
- Inform the member of staff against whom the allegation is made and explain the likely course of action
- Keep a written record of the above.

The Head Teacher, in consultation with the LADO, will make the decision whether or not to suspend the teacher / member of staff involved.

If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Education Act (2011) prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.

The Head Teacher will take advice from the LADO, the Safeguarding Governor and other agencies to agree:

- Who needs to know and exactly what information can/cannot be shared
- How to manage speculation and gossip
- What, if any, information can be given to the wider community to reduce speculation - If necessary, how to manage the press.

The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.

The following definitions will be used when determining the outcome of allegation investigations:

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

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.

Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

Both the DSL and Head Teacher will ensure that all staff should expect to support social workers and other agencies following any referral.

#### 41. Allegations relating to supply teachers/employees of third party

The school procedures for managing allegations against staff above also apply to staff not directly employed by the school, for example, supply teachers provided by an employment agency or business ('the agency'). The school will usually take the lead, but agencies/ third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

The school will discuss with the agency whether it is appropriate to suspend the supply teacher and an investigation is carried out but this decision rests with the agency and the LADO.

#### 42. Referral to the Disclosure & Barring Service and Teaching Regulation Agency

If the school ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

Referrals will be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

This will also include anyone who would have been dismissed if they had not resigned first.

For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in the DfE guidance:- Teacher misconduct: the prohibition of teachers (Feb 2022).

### 43. Low-Level Concerns

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A member of staff may have doubts about the behaviour of another adult towards a student, or another student, or concerns about how their own behaviour might be interpreted.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with students
- Having favourites
- Engaging with a student on a 1:1 basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, or offensive language,
- Email, messaging, use of social media sites or other communication between adults and students outside agreed protocols
- Any incident where he/she feels that his/her actions or behaviour towards a student or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

Staff must report any low-level concerns whatsoever to the DSL, Head Teacher or Safeguarding Governor.

The Head Teacher will be the ultimate decision maker in respect of all low-level concerns. The Head Teacher may wish to consult with the DSL and take a more collaborative decision-making approach if the need arises.

Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, 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.

When a low-level concern has been raised by a third party, the Head Teacher will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

All low-level concerns will be recorded in writing. The record will include:

- Details of the concern.
- The context in which it arose.
- Evidence collected by the Head Teacher where the concern has been raised via a third party.
- The decision categorising the type of behaviour.
- Action taken.
- The rationale for decisions and action taken.
- The name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR)

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO.

The purpose of low-level reporting is to protect both students and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

Low-level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.

A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the Whistleblowing Policy.

If there is any doubt as to whether a low-level concern meets the harm threshold, then the Head Teacher will consult with the LADO.

#### 44. Non-recent / Historical allegations

Abuse can be reported no matter how long ago it happened.

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent / historical allegations made by a child, will be reported to the LADO in line with Kent Safeguarding Children's Multi-Agency Partnership (KSCMP) procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

#### 45. Board of Governors and Proprietorial Oversight

Termly reports are sent to the Board of Governors where they discuss safeguarding issues, and they will review the data breakdown logged on the school's CPOMS system.

In addition, the Head Teacher and the DSL will communicate with the safeguarding governor about any concerns.

Should the school need to make a referral the governors will be immediately informed.

The SCR is checked periodically by the Safeguarding Governor.

#### 46. Use of school premises by external organisations

The school does not hire out its premises to external organisations.

#### 47. Adults who supervise children on Work Experience

In line with Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (Feb 2022), our organisation will ensure that the placement provider has policies and procedures in place to protect children from harm.

Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement.

The school will consider the specific circumstances of the work experience. Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

These considerations would include whether the person providing the teaching / training / instruction / supervision to the child on work experience will be:

- Unsupervised themselves, and
- Providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).
- If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children.

If so, the school will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Whilst it is acknowledged that school is not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience, it will still make enquiries with that work placement provider to seek assurances on what checks are completed on their staff.

If the activity undertaken by the child on work experience takes place in a 'specified place', such as in a nursery, school or sixth form school environment, and gives the opportunity for contact with children / young people, this may itself be considered to be regulated activity relating to children.

In these cases, and where the child doing the work experience is 16 years of age or over, the work experience provider e.g. nursery, school or sixth form school should consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16.

## Appendix 1: Categories of abuse and Specific Safeguarding Issues

### **Definitions of Abuse**

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

Some staff may feel that the content of this appendix does not apply to them due to the age -range and nature of activity described.

However, all staff must be prepared to act on disclosures from any child or parent / carer which may be occurring or witnessed outside of their organisation.

Adults or young people from within or outside of their organisation may also commit inappropriate acts which are or can cause risk of harm to young people. Therefore, information in this section is deemed relevant to be read and understood by all.

It is therefore essential that all staff are familiar with the rest of the information contained in this policy and assume it would never occur in their establishment and if any doubt refer anything reported to the DSL in the first instance.

KCSIE 2025 provides an updated definition of abuse as: *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.*

Safeguarding is also defined as: *protecting children from maltreatment inside or outside of the home including online.*

Harm can include ill treatment that is not physical as well as the impact of children witnessing ill treatment of others, particularly when children see, hear or experience domestic abuse and its effects. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

KCSIE 2025 also states the following:

- All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

- The DSL will ensure that all staff are aware of the signs of abuse. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked.

Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a pupil exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a pupil showing such signs.

### **Categories of Abuse**

The main categories of abuse outlined in KCSIE, are:

- Physical abuse
- Emotional abuse (including domestic abuse)
- Sexual abuse
- Neglect

### **Risk factors**

In an abusive relationship the child may:

- Appear frightened or wary of the parent/s or other adult.
- Act in a way that is inappropriate to her/his age and development, although full account needs to be taken of different patterns of development and different ethnic groups.

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child.
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits. - Be involved in domestic violence.

Staff should be alert to changes in a pupil's behaviour if there is a new carer (e.g., nanny or au pair) in the pupil's home.

## **Recognising signs of physical abuse**

Physical abuse 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.

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally.
- Variation in colour, possibly indicating injuries caused at different times.
- The outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.
- Bite marks.
- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks).
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.
- Medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

## **Recognising signs of emotional abuse**

Another form of abuse is 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 he or she is worthless or unloved, inadequate, or valued only insofar as meeting the needs of another person. It may include not giving the child opportunities to express his or her views, deliberately silencing the child or 'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, including domestic violence.

It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent/carer, e.g., excessive anxiety on the part of either
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Scape-goated within the family.
- Frozen watchfulness, particularly in pre-school children.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a "loner" – difficulty relating to others.
- Reverting to younger behaviour.
- Depression, withdrawal.
- Fear of academic failure or 'getting things wrong'.

## **Recognising signs of sexual abuse**

Sexual abuse (KCSIE 2025, paragraph 27) involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching the 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 (eg via the internet). Sexual abuse can take place online, and technology can 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 (see KCSIE 2025, Part Five).

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural. Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play or conversation, inappropriate to the pupil's age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorders), self-mutilation and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a younger girl where the identity of the father is not disclosed.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

## **Harmful Sexual Behaviour**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB).

The term has been widely adopted in child protection and is used in this advice.

HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

## **Signs of neglect**

Neglect may be defined as 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).
- Ensure access to appropriate medical care or treatment. - Be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

- The child is dirty, smelly, poorly clothed or appears underfed.
- The child has lingering illnesses which are not attended to.
- There is a marked deterioration in schoolwork.
- The child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums.
- An air of 'detachment' or a 'don't care' attitude.
- Overly compliant behaviour.
- A child who is reluctant to go home or is kept away from school for no apparent reason.
- 'Tummy pains' with no medical reason.
- Running away from home, suicide attempts.
- Extreme anger, sadness or depression.
- Child left with adults who are intoxicated or violent.
- Child left alone for excessive periods.
- Child thrives away from home environment.

## **Affluent neglect**

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing.

This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

## **Specific safeguarding issues**

Further safeguarding issues of which staff should be aware are detailed below. Extensive guidance on a wide variety of specific issues can be found in Annex B of KCSIE and in other guidance listed at the end of this policy.

- Child abduction and community safety incidents.
- Children missing from education – also see Attendance Policy.
- Children and the court system.
- Children missing from education.
- Children with family members in prison.
- Child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE) - Domestic abuse.
- Fabricated or induced illness.
- Homelessness.
- So-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage.
- Mental health.
- Child-on-child abuse including: Nudes/semi-nudes, youth produced sexual imagery sexual violence and sexual harassment
- Up-skirting
- Online behaviour and cybercrime - Private fostering.
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

The DSL will ensure that staff are aware of specific issues including, but not limited to: child-on-child abuse; sexual violence and sexual harassment; online abuse, including imagery; domestic abuse; parents affected by drug or alcohol abuse; child sexual exploitation, female genital mutilation; fabricated or induced illness; children missing education; preventing radicalisation; mental health.

### **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.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are two age-appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The school may refer some parents and carers to this service where appropriate.

### **Children Absent from Education / Children who go missing from education.**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Our organisation's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social

care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support which our organisation draws upon, includes:

- Statutory guidance on school attendance 'Working together to improve school attendance' updated August 2025 including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Children missing education - DfE statutory guidance – August 2024

All students are recorded on the school's admission register and their attendance is recorded in the daily attendance register.

Staff must be aware that repeated absence may be an indicator of can be a potential indicator of abuse or neglect and repeated absence must be brought to the attention of the DSL.

All unexplained absences will be followed up in accordance with the Attendance Policy.

The local authority is informed of any student whose name is added to or deleted from the admission register at a non-standard transition point.

If a student leaves the school, whether or not there are concerns about that student, the school will make every effort to obtain the details required for the local authority return, including the name of the student's next school, the expected start date, and, where applicable, the family's new address and the date they will move.

If there are concerns about a student and a parent refuses to supply the information this may also result in a report to Children's Services.

The school will inform the local authority of any student who fails to attend school regularly or who has been absent without the school's permission for a continuous period of ten days or more.

When a student moves to another school, the DSL must inform the receiving school without delay that child protection records will be transferred. Within 5 days the original records must be transferred securely, either by hand, by Royal Mail Special Delivery Guaranteed or Royal Mail Signed For post (with a receipt obtained), or electronically using a secure method. In all cases, confirmation of receipt must be obtained from the receiving school. Duplicate records must be retained. Duplicate records should be kept securely until the pupil reaches the age of 25 years.

The school holds contact details for both parents (unless a parent is deceased, or a parent has no contact with the child) and two emergency contact numbers.

## **Children with family members in prison**

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

## **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Earlscliffe is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- Inappropriate relationships: Usually involves just one abuser who has inappropriate power (physical, emotional or financial) or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- Boyfriend: Abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they seek help.
- Organised exploitation and trafficking: Victims are trafficked through criminal networks, often between towns and cities, and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

## **Child Criminal Exploitation (CCE) including gangs and County Lines**

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part in education.
- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Mood swings or changes in emotional wellbeing.
- Drug and alcohol misuse.
- Displaying inappropriate sexualised behaviour.

## **Domestic abuse**

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidences. The abuse can be but not limited to, psychological, physical, sexual, financial and emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

The school will be mindful that children can often blame themselves for the abuse or may have had to leave the family home because of the abuse.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

## **Extra-familial Harms**

All our staff, but especially the designated safeguarding lead (and deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice can be found at: <https://tce.researchinpractice.org.uk/>

## **Operation Encompass**

When police are called to an incident of domestic abuse and there is a child(ren) in the household the police will usually inform the DSL in school before the child(ren) arrives at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable appropriate support to be given to the child.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

## **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.

## **So called 'honour based' abuse (HBA)**

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour.

Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the school's local safeguarding procedures

## **Female Genital Mutilation**

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A pupil may have difficulty walking, sitting or standing and may even look uncomfortable. A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be

prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society.
- Mother or a sister who has undergone FGM.
- Girls who are withdrawn from PSHCE.
- Visiting female elder from the country of origin.
- Being taken on a long holiday to the country of origin.
- Talk about a 'special' procedure to become a woman.

### **Mandatory Reporting of FGM**

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure.

Under no circumstances should school staff physically examine students.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101.

The report should be made immediately.

The duty to report should not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999 if appropriate.

### **Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

The Forced Marriage Unit (FMU) has created: multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK ([www.gov.uk](http://www.gov.uk))

School staff can contact the Forced Marriage Unit if they need advice or information:  
Contact: 020 7008 0151 or email [fmufcdo.gov.uk](mailto:fmufcdo.gov.uk)

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Mental health**

Schools and colleges have an important role to play in supporting the mental health and wellbeing of students. Mental health problems can also, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- Identification: recognising emerging issues as early and accurately as possible
- Early support: helping pupils to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a student is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the student's needs.
2. a plan to set out how the student will be supported.
3. action to provide that support.
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on students.

These include:

- Loss or separation: resulting from death, parental separation, divorce, hospitalisation
- Loss of friendships (especially in adolescence)

- Family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- Life changes such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school • traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries.
- Other traumatic incidents such as natural disasters or terrorist attacks; Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- Emotional disorders: phobias, anxiety states and depression
- Conduct disorders: stealing, defiance, fire-setting, aggression and antisocial behaviour
- Hyperkinetic disorders: disturbance of activity and attention
- Developmental disorders: delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- Attachment disorders: children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- Other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem.

School and college staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have any concerns about the mental health of a child, they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the DfE 'Mental Health and Behaviour in Schools' guidance.

### **Child-on-Child Abuse (formerly known as Peer-on-peer abuse)**

Children are also vulnerable to abuse by their peers. The school has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Staff will always challenge such behaviours.

Any student can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children.

However, individual, and situational factors can increase a child's vulnerability to abuse by their peers.

For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable as may pupils with SEND or certain medical conditions.

Children who are LGBT can also be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

### **Children who are lesbian, gay, bi, or trans (LGBT) or gender questioning**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse from the statutory guidance available.

Our staff will work with families of those young persons who may be questioning their own gender and encourage them to seek help and advice from a clinical professional with relevant experience.

Our staff, when supporting a gender questioning young person, will take a cautious approach and consider the broad range of their individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

### **Strategies to reduce the risk of child-on-child abuse**

Preventative strategies for child-on-child abuse are regularly considered. The school has an ethos where pupils feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always by staff.

There is a strong and positive PSHE and RSE curriculum and pastoral care system, which gives pupils an open forum to talk things through and explore disputes or difficulties. The IT curriculum also teaches pupils about acceptable online behaviour.

The Student Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

### **Prejudiced Behaviour**

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

### **Child-on-child Abuse - sexual violence and sexual harassment**

The school also has a zero-tolerance approach to any form sexual violence and sexual harassment; it is never acceptable and will not be tolerated.

All staff working or volunteers working in our organisation have been advised to maintain an attitude of "it could happen here".

Staff have been trained to be aware of and respond to ALL reports and concerns relating to sexual violence and / or sexual harassment both online and offline, including those which might be happening outside the school. Our DSL will take charge of procedures following a report on sexual violence / sexual harassment.

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure.

Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE, paragraph 487. This will include:

- Initial response: considering the needs of both victim(s) and alleged perpetrator(s).

The victim will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered. This however will be balanced against the school's duty and responsibilities to protect other children and the following factors below:

- The nature of the alleged incident(s), including whether a crime may have been committed and /or whether Harmful Sexual Behaviour (HSB) has been displayed.
- The ages of children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children – are alleged perpetrators significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- Is the incident a one-off or sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- Has the sexual violence / harassment taken place within an intimate personal relationship?
- Importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Any on-going risks to the victim, other children, adult students or school staff?
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation?

The DSL will also review the following when responding to a report of sexual violence in order to make sure the right procedures are carried out:

- Record Keeping
- Risk Assessment of the disclosure / event.

- Consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police.
- Ongoing response – safeguarding and support for all parties

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police.

The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the students involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the student making the allegation and the alleged perpetrator and will explain the course of action, unless this is considered to place either of them at further harm.

If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

### **Considering confidentiality and anonymity**

**Confidentiality:** Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

The school will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

For example, the public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Staff **MUST** seek advice from the designated safeguarding lead (or deputy), who will consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and the police.
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.
- Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, and the reasons will be explained to the victim and appropriate specialist support will be offered to the student

**Anonymity:** Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, appropriate staff will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

We will do all we can as an organisation to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Any sanctions required following a report of child-on-child abuse will be determined on a case-by-case basis.

### **Risk assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- The victim, especially their protection and support

- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (paper or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our children and young people and put adequate measures in place to protect and keep the child safe.

### **Appropriate Support for Victim and Perpetrator**

Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

This will include pastoral support for both perpetrator and / or victim, through in-house counselling, reflection or behaviour modification support which may also be sought from external specialist agencies.

In all cases the school will monitor the progress of both perpetrator and victim to ensure that this type of behaviour does not occur again.

### **Remote Education**

Remote education can be defined as when the school is in regular contact with students who have logged onto the system for receiving the delivery of educational lessons over the internet. This method of delivery is classed by our organisation as lone working if only one tutor is working with one pupil over the internet e.g. holding a tutorial or an online peripatetic lesson.

Therefore, specific arrangements must be in place to safeguard both parties involved in the session. All our staff who deliver online learning will be appropriately trained to do so.

The school will ensure that those communications will be used to reinforce the importance of children being safe online and enable parents and carers to understand what systems the school uses to filter and monitor online use.

Parents and / or carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school and if their child is going to be interacting with online.

### **Youth produced sexual imagery, nudes/semi-nudes, sexting, up-skirting**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Up-skirting is also a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents / carers will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the pupil at risk of harm.

If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

### **Preventing Radicalisation**

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is known as the 'Prevent Duty'. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school safeguarding approach. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to

intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

### **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes.
- Glorifying violence, especially to other faiths or cultures.
- Making remarks or comments about being at extremist events or rallies outside school.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations or other extremist groups.
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.) - Secretive behaviour.
- Online searches or sharing extremist messages or social profiles.
- Intolerance of difference, including faith, culture, gender, race or sexuality.
- Graffiti, artwork or writing that displays extremist themes.
- Attempts to impose extremist views or practices on others.
- Verbalising anti-Western or anti-British views.
- Advocating violence towards others.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

A representative from the school may be asked to attend the Channel panel to help with this assessment.

## **Martyn's Law – Terrorism (Protection of Premises) Act 2025 - Unwanted Visitors / Lockdown procedures**

Martyn's Law – The Terrorism (Protection of Premises) act 2025 became law on 3rd April 2025. Named after Martyn Hett who was sadly killed in the Manchester Arena bombing on 22nd May 2017.

Whilst this policy has been written taking into account child protection guidance provided from the Prevent Duty, our organisation will be working towards achieving the STANDARD TIER recommendations for venues who can hold between (200 - 799 persons) as laid out in Martyn's Law.

Earlscliffe will ensure steps have been taken to prepare for any potential terrorist attack and be ready to help keep our young people, staff and anyone else on the premises in the event of any attack or unwanted intruder on the premises.

Earlscliffe has a member of the senior leadership who has been appointed to oversee the roll out of security procedures to meet our duty under the new Act is:

- Adam Payne: [adampayne@earlscliffe.co.uk](mailto:adampayne@earlscliffe.co.uk)

Please refer to our lockdown policy for further information

### **Private Fostering**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

### **Fabricated Illness**

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause. There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means

## Appendix 2: Human Rights Act 1998 and Equality Act 2010

### **Human Rights Act**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention.

The specific convention rights applying to schools are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right).
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity.
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1, - Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

### Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act 2010).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or

students with a particular protected characteristic to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools ([www.gov.uk](http://www.gov.uk)). For further information Equality Act guidance: Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

