



## KENT COLLEGE CANTERBURY

### CHILD PROTECTION POLICY (Safeguarding) including JS, EYFS, Boarding, and the ISC

<b>Owner</b>	Designated Safeguarding Lead, Senior School and Designated Safeguarding Lead, Junior School
<b>Applies to</b>	Staff, volunteers and contractors working with pupils on school premises or away from the school on an activity, visit or other educational pursuits. It does NOT apply to Garden Cottage Nursery, which has its own policy.
<b>Date last reviewed</b>	September 2025
<b>Date of next review</b>	September 2026
<b>Committee approved by</b>	Full Board (annually), Education, Wellbeing and Standards (annually)
<b>Review period</b>	1 year

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The Nominated Governor for Child Protection is Mrs Georgina Baker:  
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The policy is in accordance with the [Independent Schools Standards Regulations \(2014\)](#), [National Minimum Standards for boarding and the EYFS](#), [Working Together to Safeguard Children \(2023\)](#), [Keeping Children Safe in Education \(2025\)](#) Additionally, the policy has been produced to fully reflect the policies and directives of the Kent Multi Agency Partnership (MAP) and to incorporate statutory guidance. The policy includes reference to the 'Prevent' duty and Channel processes as determined by the [Counter-Terrorism and Security Act 2015](#).

Kent College values its Methodist ethos based on respect and mutual tolerance. Parents and guardians have an important role in supporting the work of the School. This policy will be reviewed by the Board of Governors at least annually and a copy of the policy will be provided on the school's website. Kent College, as a MIST school, also abides by the [MIST Child Protection Policy](#), which describes the delegation of the proprietor's responsibilities to school

governors and the reporting required.

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## 1.0 A Child Centred and Coordinated Approach to Safeguarding

The safety and wellbeing of all our pupils at Kent College is our highest priority. Our business is to know every pupil as an individual and to provide a secure and caring environment, so that they can learn, and undertake educational activities in safety. Safeguarding and promoting the welfare of children is **everyone's** responsibility. No single professional can have a full picture of a child's needs and circumstances and so **everyone** who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interest** of the child. This includes protecting children from maltreatment, preventing impairment of children's mental or physical health and development, ensuring children are able to grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. Prompt action will be taken to ensure all children have the best outcomes. Children will include everyone in the school under the age of 18 years.

School staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating. All staff have a responsibility to provide a safe environment in which children can learn. All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any staff member who has a concern about a child's welfare should follow the referral processes set out in **Appendix 4**. Staff should expect to support social workers and other agencies following any referral.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated

Safeguarding Lead (DSL) or Deputy DSL.

The school recognises its responsibilities to report to children's services when it is felt that a child is suffering or is likely to suffer significant harm. Additionally, the school will take steps to ensure the welfare of pupils is actively promoted, including referral to children's services for additional help and support. In this connection, it is everyone's responsibility in the school to be vigilant and to be prepared to report welfare or child protection concerns to the Designated Safeguarding Lead(s). This includes all full time and part time staff, supply staff, contractors, volunteers and visitors to the school.

We acknowledge the importance of involving all staff in the development of the child protection policy and during training colleagues are invited to contribute suggestions to make policy and practice as effective as possible.

There are six main elements to our policy:

1. Establishing a safe environment in which pupils can learn and develop.
2. Ensuring the governance of safeguarding and promotion of welfare is fully embedded within the school.
3. Raising awareness of child protection issues and ensuring staff, volunteers and contractors working at the school are fully aware of presenting issues and how to act in the event of concerns being raised; working with the school's Whistleblowing Policy.
4. Ensuring staff recruitment practice is safe and fully accords with the requirements of *Keeping Children Safe in Education (2025)*; please see Staff Suitability Declaration Form.
5. Supporting pupils who are in need of protection or require early help to achieve good outcomes.
6. Being alert to the needs of all pupils at the school taking into account the school demography, local community and issues emerging locally or nationally in respect of the types of harm which may affect children.

## **2.0 Training in Safeguarding and Promotion of welfare**

### **2.1 Opportunities to Teach Safeguarding**

The school teaches safeguarding including Online Safety, Relationships Education (in the Junior School) and Relationships and Sex Education (in the Senior School) and to build resilience towards radicalisation and extremism through a wide range of contexts as part of the broad and balanced curriculum including but not limited to PSHE, ICT and the tutor programme, the pupil mentoring programme, chapel and assembly themes, visiting speakers and more informal teacher pupil interactions.

All staff, in all areas, must complete the safeguarding induction when they start work at Kent College. Training is then given at the start of the year and drip fed throughout the year. The training is a blend of online training and face-to-face training, including guest speakers where

possible. Staff in EYFS also have training relevant to the protection of children under the age of 5.

### **3.0 Identifying abuse – types of abuse and neglect?**

Through their day to day contact with pupils, school staff are well placed to observe any signs that a child may be suffering or is likely to suffer significant harm or is in need of additional support to actively promote their welfare. The school will therefore:

- Establish and maintain an environment where pupils feel secure, are encouraged to talk, and are listened to
- Ensure pupils know that there are adults in the school whom they can approach if they are worried through the system of form tutors, pastoral team, school nurse, school counsellor and independent listener.
- Include opportunities in the PSHE & RSE curriculum for pupils to develop the skills they need to build healthy and respectful relationships and keep themselves safe from harm including the safe use of the internet.

The following definitions are taken from [\*'Working Together to Safeguard children 2023'\*](#)

All 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.

#### **3.1 Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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. They may be abused by an adult or adults or by another child or children.

#### **3.2 Physical abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### **3.3 Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects

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

### **3.4 Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

### **3.5 Neglect**

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

## **4.0 Reporting concerns about a child**

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being 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. Information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

If any member of staff or volunteer has a concern that: a child may be suffering significant harm; is likely to suffer significant harm or; is in need of additional support in order to promote their welfare, then the member of staff or volunteer should inform the DSL without delay by logging their concern on CPOMS immediately or should contact the DSL who will then ask them to make a log on CPOMS without delay with the school's DSL. CPOMS can be found on staff bookmarks or [linked here](#).

The DSL will make a referral to children's social care (Front Door) in accordance with local protocols where significant harm exists or is likely, including taking advice. Such contacts must be made without delay where there is a risk of immediate serious harm to a child. Where issues of general welfare are raised the Designated Safeguarding Lead will make a judgement regarding referral to children's services, particularly where additional help is required. Advice from children's services will be sought where necessary.

It should be noted that members of staff can refer children directly to children's services if they feel that appropriate action is not being taken.

Schools are not in a position to conduct investigations where significant harm is thought to exist. It is entirely for the statutory child protection agencies (children's services or police) to investigate significant concerns in accordance with Section 47 Children Act 1989. Where help and support is being sought to promote the welfare of children it will be for children's services to conduct an assessment in accordance with Section 17 Children Act 1989. The school will always cooperate with any investigations or assessments under sections 47 or 17.

The DSL must ensure that the child's wishes and feelings are taken into consideration when determining the actions to be taken and what services are required to ensure protection. However, staff must never promise confidentiality to the child and must always act to ensure the interests of the child are always the paramount consideration.

If a child is in immediate danger or is a risk of harm a referral should be made to children's social care and/or the police immediately. If a member of staff makes a referral directly s/he should inform the DSL/Deputy DSL as soon as possible thereafter.

## **5.0 Specific Safeguarding Issues**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. All staff

should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; upskirting; sexting; and initiation/hazing type violence and rituals.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside school. All staff, but especially the DSL (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as **extra-familial harms**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that the school can provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

**NB. See Appendix 1 for characteristics and indicators of child abuse or neglect.**

## **5.1 Further Information**

Further information on Child abduction and Community Safety, Missing Children, Children and the Court System, Children with Family Members in Prison, Child Sexual Exploitation, Honour Based Abuse, Female Genital Mutilation (FGM), child on child Abuse/Harassment, Preventing Radicalisation and The Taking and Sharing of Indecent Images, Sexual Violence and Sexual Harassment, Mental Health, Children who need a social worker (see also KCSIE 2025 annex B).

The school is aware of and alert to other forms of harm that may adversely affect children. In this connection the school will be advised by the Kent Safeguarding Children Multi-agency Partnership, national guidance and other forms of advice. Current issues are identified below but this list is not exhaustive. The school will seek expert and professional advice on specific safeguarding issues relating to such matters as child sexual exploitation, bullying, or matters linked to cultural customs or practice. Staff must also be aware of issues associated with child on child abuse, consequential harm and the need to ensure that such matters are appropriately handled in the best interests of both the victim(s) and alleged abuser(s). If there is suspected abuse by one or more pupils against another pupil when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm then the matter will be referred to local agencies. In the event of any disclosures of pupil on pupil abuse all children involved whether perpetrator or victim are treated as being at risk.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for schools and colleges on the TES website and also on its own website [NSPCC](#) and colleges can also access broad government guidance on specific safeguarding issues such as mental health and wellbeing at

Staff must also be alert to the impact of bullying, cyber-bullying and behaviours which may place individual children at risk of serious harm, including children who go missing from school. Please see our Behaviour Policy for more information.

## **5.2 Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils as well as support from our SENDCO and Medical Centre and seek to support pupils to overcome any communication barriers they face.

## **5.3 Children who are lesbian, gay, bi, or trans (LGBT+)**

The fact that a child or a young person may be part of the LGBT+ community 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. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. Students have access to KC EDI leads for additional support. LGBT+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

## **5.4 Child Abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers. Other community safety incidents in the vicinity of a

school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence, for example, as they start walking to school on their own, it is important they are given practical advice on how to keep themselves safe. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers

Concerns of this nature must be reported to the DSL if you feel a child has or is in danger of being abducted and if appropriate the police are contacted.

## **5.5 Children Missing Education or Absent**

All new pupils are placed on the school's admission register at the beginning of the first day on which the school has agreed that the pupil will attend the school. If a child fails to attend on the agreed date, staff must inform the Head of Senior School or Junior School Head, or the DSL without delay. The Head, or DSL will consider notifying the local authority at the earliest opportunity. Where there are changes affecting the child (including a change of address or school), these will be reflected in the admission register. This will assist the school and external agencies when making enquiries to locate any missing children.

A child going missing from education is a potential indicator of abuse or neglect; the failure to provide a suitable education is now included in the statutory definition of neglect (WT2023). School staff are alert to patterns of school attendance and form tutors, Heads of Year and House Parents monitor attendance. School will endeavour, wherever possible, to hold more than one emergency contact for each pupil. Concerns are raised at weekly meetings and early help intervention such as contact with home or submitting a Front Door referral to the Local Authority are made. All staff are made aware that concerns must be suitably reported to the Designated Safeguarding Lead(s).

The school will inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Where a pupil has been continuously absent without authorisation for a period of not less than 20 school days (and there are no reasonable grounds to believe the pupil is unwell or unable to attend because of any unavoidable cause), and the school and local authority have failed, following reasonable enquiry, to ascertain where the pupil is, the school may delete the pupil's name from the admission register. The school will inform the local authority of such deletion no later than the time at which the pupil's name is deleted from the register. The school also recognises its wider reporting duties following deletions from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006, and statutory guidance [Children Missing Education](#) to help identify children who are absent and/or otherwise at risk of harm. The school will inform the local authority of any pupil who joins the school or leaves the school at a non-standard transition time, if they are required to be in compulsory schooling.

## **5.6 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. Guidance can be found [here](#). 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. This may be useful for some parents and carers.

## **5.7 Children with Family Members in Prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. We would work with NICCO should we have a pupil in this situation.

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

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). CCE indicators (below) can also be indicators of CSE, as can: children who have older boyfriends or girlfriends; and children who suffer from sexually transmitted infections or become pregnant. The department provide: Child sexual exploitation: [guide for practitioners](#). The DSL is the lead for Sexual Exploitation.

## **5.9 Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

A victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines- see below) forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE: children who

appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education. The DSL is the lead for Criminal Exploitation.

### **5.10 County Lines/Gangs**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

### **5.11 Serious Violence**

Staff need to be aware of the indicators that may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs. The school is aware of the associated risks and ways to manage these using the guidance available from the Home Office: [Advice to schools and colleges on gangs and youth violence](#) and [Criminal exploitation of children and vulnerable adults: County Lines](#)

### **5.12 Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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 and long-term impact on their health, well-being, development, and ability to learn.

The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, 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 but is not limited to: Psychological; physical; sexual; financial; and emotional. 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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Kent College is signed up to Operation Encompass, a police initiative set-up to help schools to provide support to children who have been present, exposed to or involved in any domestic abuse incident. Notifications may not be received for students whose home is outside the MAP area. We know that children can be significantly physically or emotionally harmed when they witness or are involved, directly or indirectly, with any domestic abuse incident. The report from the police is sent to the Designated Safeguarding Lead by secure email to enable them to use the information that has been shared in confidence while ensuring that the school is able to make provision for the right support to be available for any child and their family.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

[Safelives: young people and domestic abuse](#)

### **5.13 Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. Further guidance is detailed in Annex B.

## 5.14 Honour Based Abuse (HBA), including Female Genital Mutilation (FGM) and Forced Marriage

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of so called 'Honour Based Abuse' , including FGM, or already having suffered FGM or forced marriage or practices such as 'breast ironing'. All forms of HBA are abuse regardless of the motivation. There is a range of potential indicators that a child or young person may be at risk of HBA or FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of HBA or FGM are likely to come from a community that is known to practice HBA or FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, and further information about FGM can be found in the [Multi-Agency Practice Guidelines](#).

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a **specific legal duty on teachers and health professionals**. If a teacher or health professional (e.g. our school nurse), in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, **the teacher / health professional must report this to the police by calling 101**; they should then inform the DSL unless they have good reason not to.

## 5.15 Modern slavery and the National Referral Mechanism

Modern Slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Slavery: To exercise "ownership" over an individual. Forced or Compulsory Labour: Force an individual to provide work or a service. The work/service is NOT freely given. Servitude: An aggravated form of Forced or Compulsory Labour with a degree of permanence. If a child is thought to be at risk of modern slavery the DSL will complete a referral and seek additional support from authorities.

## 6.0 Child on child Abuse

Children are capable of abusing their peers. Governing bodies will ensure that appropriate steps are taken to minimise the risk of child on child abuse taking into account gender issues and the inculcation of the school's values and central ethos, in that all members of the community should treat each other with respect. The school makes it clear that abuse should never be tolerated or passed off as "banter" or "part of growing up." The school's anti-bullying and behaviour policies explain in detail the ways in which we seek to ensure that all children

are free from child on child abuse.

Child on child abuse can occur between children of any age or sex and when occurring between children of primary age it is called child on child abuse. Domestic abuse in intimate relationships between pupils is a form of child on child abuse. It could for example include bullying (including cyberbullying), physical abuse such as hitting, kicking, biting, shaking, hair pulling or otherwise causing physical harm, sexual violence such as rape, assault by penetration and sexual assault, sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which maybe stand alone or part of a broader pattern of abuse; upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or harm, sexting (also known as youth produced sexual imagery), initiation/hazing type violence and rituals. The school will be alert to this potential and will take steps to respond to such concerns, including referral to the DSL in order to secure early help services or to make a child protection referral. Where a crime has been committed, the police will be notified. Care will be taken to ensure that both the victim of alleged abuse as well as the perpetrator are suitably supported and helped, for example through the school counsellor or other Early Help provision. Advice will be sought from Kent children's services where child on child abuse is felt to exist and this may lead to social care action and investigation in accordance with Kent Multi Agency Partnership policies.

It is important that the following points are noted (explained to the child):

- That pupils are aware that the law is in place to protect them rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- The need for the school to be part of the discussions with statutory safeguarding partners.

In addition, all relationships need to be considered.

- Boarding Students will be made aware that sexual relationships between children are not acceptable.
- Our approach to child-on-child abuse will reflect the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation. Rules about areas they can and can't go are explained to boarders. Along with outline of child-on-child abuse and consequences of this. We also offer a communal room for mixed gender students to meet in each house. Boarders are not allowed in other students' rooms regardless of gender.

## **6.1 Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil you must record the allegation and tell the DSL and record through CPOMS, but do not investigate it. If relevant, the DSL will contact the local authority children's social care team and follow its advice, as well as the police

if the allegation involves a potential criminal offence. If the incident is alleged to have taken place on school premises, staff should be aware that there is a potential crime scene and not move, clean or change anything until advised otherwise.

If needed, the DSL will put a risk & needs assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. The DSL and other staff are AIM trained and may use the AIM education resources to inform the risk & needs assessment

The DSL will contact the child and adolescent mental health services (CAMHS), if appropriate and ensure the recording, investigating and dealing with allegations, and supporting victims, perpetrators and any other children affected are effective whilst creating a supportive environment in school and minimising the risk of child-on-child abuse.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

## **6.2 How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports**

Even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”. If staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

It is essential that staff understand that a child who has experienced abuse or harm may not be able to recall facts and / or may not realise they have been abused.

Staff have to play an important role in preventing child-on-child abuse and responding where they believe a child may be at risk and should speak to the DSL if they have any concerns. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence

with respect to boys.

- Ensure our curriculum including PSHE helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse by speaking to a member of staff.
- Ensure staff reassure victims that they are being taken seriously.
- Ensure staff are trained to undertake this task

We recognise that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. We also recognise that pupils who identify as, or are perceived by their peers to be, LGBT+ are also at increased risk of experiencing child on child abuse.

Allegations will be recorded and kept on our internal system through CPOMS.

### **6.3 Taking and Sharing of Indecent Images and Youth Produced Sexual Imagery**

Previously referred to as 'sexting', Government advice now distinguishes between Youth Produced Sexual Imagery, and the Taking and Sharing of Indecent Images. [Sharing nudes and semi-nudes: advice for education settings UKCCIS](#) A key consideration is for staff not to view or forward illegal images of a child; if it is suspected that a device contains illegal images, the DSL will seek advice from the police. [UKCCIS](#) provides more details on what to do when viewing an image is unavoidable.

The school will treat Youth Produced Sexual Imagery initially as a safeguarding issue and should an incident come to the attention of staff, it should be referred to the DSL as soon as possible. The DSL will hold an initial review meeting with appropriate school staff. There will be subsequent interviews with the young people involved (if appropriate) and advice will be taken whether it is necessary to view the image(s) taking into account the need to prevent significant distress to the pupil(s) and the guidance within the Government advice and the law.

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm or cause issues with police investigations. At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

The types of incidents this might include are: A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18; A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult; A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

The Taking and Sharing of Indecent Images of people under 18 by adults, and young people under 18 sharing adult pornography or exchanging sexual texts that don't contain imagery will not be tolerated and sanctions will be enforced, including potentially informing the police, and regardless of the use of school or personal equipment both on and off school premises.

Please also refer to the school's anti-bullying policy and DfE [Searching, screening and confiscation advice](#) for schools and Child Exploitation Online Protection Centre ([CEOP](#)) sexting guidance.

## **7.0 Child on Child Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours**

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

There are many ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. We use the term 'victim' within this policy as it is a widely recognised and understood term but recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. We will be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. We use the term 'alleged perpetrator' within this policy. It is important to remember that, as a child, any alleged perpetrator may also be a victim and is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult who is alleged to have abused a child.

Concerns of this type must be reported to the DSL and possibly the police if a crime has been committed or DSL isn't available. The DSLs are AIM trained and will use their training to support decisions.

It is important that all victims are taken seriously and offered appropriate support. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Kent College is clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. We will not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys" and challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia. Dismissing or tolerating such

behaviours risks normalising them. We recognise that children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and communication barriers and difficulties overcoming these barriers. Children who are Lesbian, Gay, Bi, or Trans (LGBT+) can be targeted by their peers. In some cases, a child 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+.

## **7.1 Sexual Violence**

Children can, and sometimes do, abuse their peers in the context of child-on-child sexual violence, specifically sexual offences as described under the Sexual Offences Act:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity; the age of consent is 16; sexual intercourse without consent is rape.

## **7.2 Sexual Harassment**

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include: sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (taking into consideration when

any of this crosses a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### 7.3 Harmful Sexual Behaviours

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviours". Advice on signs, indicators and effects of harmful sexual behaviours is available:

[AIM for Education](#)

[NSPCC: Harmful sexual behaviour: signs-indicators-effects](#)

[Stop It Now: harmful sexual behaviour toolkit](#)

[Parents Protect: traffic light tool for parents and carers](#)

Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two. Harmful sexual behaviours should be considered in a child protection context. When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Harmful sexual behaviours **can**, in some cases, progress on a continuum. Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

### 8.0 Preventative Education and relationships

Kent College recognises its role providing an effective preventative education programme through a whole school approach that prepares pupils for life in modern Britain. We have a clear set of values and standards upheld and demonstrated throughout all aspects of school life, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum developed to be age and stage of development appropriate, and tackling such issues as: healthy and respectful relationships; what respectful behaviour looks like; gender roles, stereotyping, equality; body confidence, sexual relationships and self-esteem; prejudiced behaviour; that sexual violence and sexual harassment is always wrong; and addressing cultures of sexual

harassment. Good practice is that which allows children an open forum to talk things through. Such discussions can lead to increased safeguarding disclosures. Children should be made aware of and reminded of the processes by which to raise their concerns or make a report. This should include processes when they have a concern about a friend or peer. All staff should be aware of how to support children and how to manage a disclosure as described within this policy. We make it clear that sexual relationships are not acceptable in school regardless of age or sexuality.

## **9.0 Mental Health**

School has an important role to play in supporting the mental health and wellbeing of our pupils and will take advantage of the Designated Mental Health Lead training programme accredited by the DfE. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, trauma or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; within school, students and staff have access to qualified school counsellors and through the Medical Centre or the GP, access to Mental Health services. A referral to mental health services can also be made by the school and this would normally be the DSL, Head of Year, Mental Health Lead or potentially, the SENDCO. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one and should offer help and guide children to access professional support. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the DSL or the Head of Student Personal Development and Wellbeing, who is a DDSL.

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for materials. Referrals can be made directly to CYPMHS, with the consent of the parent and / or pupil <https://www.nelft.nhs.uk/kent-cypmhs-get-in-touch>

## **10.0 Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share with the school the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Students who have, or have had, a social worker will be made known to their teachers and Head of Year.

## **11.0 Online Safety**

As the school increasingly works online it is essential that children are safeguarded from potentially harmful and inappropriate online material. The governing body ensures appropriate filters and appropriate monitoring systems are in place without 'over blocking'.

Governors will regularly review the effectiveness of school filters and monitoring systems. They will ensure that the leadership team and relevant staff are:

- Aware of and understand the systems in place
- Manage them effectively
- Know how to escalate concerns when identified.

KC will use communications with parents and carers to reinforce the importance of children being safe online. We will share information with parents/carers about:

- what systems they have in place to filter and monitor online use
- what we are asking children to do online, including the sites they will be asked to access
- who from the school (if anyone) their child is going to be interacting with online.

Our Boarding Houses will have clear guidance regarding how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 4 and 5G that will bypass the school's filtering and monitoring systems. There is a policy/guideline in place for online safety. Boarders in Years 7-10 have to hand in their phones before they go to bed. Students are also encouraged to use our Wi-Fi so the filters will work on their phones.

Our Mobile phone policy has been put together to create a better and safer environment in

school. Children with mobile phones have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means there is a danger that some children, whilst at school, may sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (sometimes via large chat groups) and view and share pornography and other harmful content. Our mobile phone policy and online safety policy set out to give students and parents further guidance. We educate our students through PSHE and IT lessons to stay safe online including use of their mobile phones.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

The school has put in place a number of systems to promote online safety, including robust filtering systems, Acceptable Use Policy for older pupils and staff and Online Safety Pledge for younger pupils, information evenings and literature for parents, lesson content to teach online safety. Full details can be found in the Online Safety Policy.

Online safety is taught throughout the school but specifically covered within ICT lessons taking account of the guidance [Teaching Online Safety in Schools](#) and [Education for a Connected World](#)

Through training staff to be able to identify children who may be at risk of harm as a result of their or other's use of technology or the internet and know when it is appropriate to refer to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

### **11.1 Remote learning**

Where children are being asked to learn online at home the DfE has provided advice to support schools and colleges to do so safely: [safeguarding and remote education](#).

UK Safer Internet Center – [Remote learning](#)

Safer Recruitment Consortium: [guidance for safer working practice 2022](#)

### **11.2 Monitoring and Filtering**

Schools and colleges should provide a safe environment to learn and work, including when online. staff must not rely on filtering & monitoring software to protect children. Staff need to be aware of the possibility of children accessing harmful material and their individual responsibility to keep children safe online, including good supervision of students during

lessons. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It's important that the right people are working together and using their professional expertise to make informed decisions.

The DSL and IT manager work closely with each other and governors to ensure the monitoring and filtering software is being used effectively and picking up concerns. Monitoring and Filtering will not pick everything up and sometimes schools need to be made aware of concerns before the software will monitor and/or filter.

### **Reviewing Monitoring and Filtering**

For filtering and monitoring to be effective it should meet the needs of our pupils and staff and reflect our specific use of technology while minimising potential harms.

To understand and evaluate the changing needs and potential risks of our school or college, we review our filtering and monitoring provision, at least annually.

Additional checks to filtering and monitoring need to be informed by the review process so that governing bodies and proprietors have assurance that our systems are working effectively and meeting safeguarding obligations.

### **Monitoring and Filtering not unreasonably impacting teaching and learning**

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.

No filtering system can be 100% effective. There is a need to understand the coverage of our filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet your statutory requirements in [Keeping children safe in education](#) (KCSIE) and the [Prevent duty](#).

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration
- restrict students from learning how to assess and manage risk themselves

## Effective monitoring strategies to meeting the schools safeguarding needs

Monitoring user activity on school devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software.

Monitoring allows the school to review user activity on school devices. For monitoring to be effective it should pick up incidents urgently, usually through alerts from the monitoring software, allowing the school to take action and record the outcome.

Our monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

## 12.0 Radicalisation (The Prevent Duty)

Children are susceptible to extremist ideology and radicalisation including far right ideology. Protecting children and staff from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent susceptible people being radicalised. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious 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.

Staff should be alert to changes in children's behaviour which could indicate that they could be in need of help or protection. Staff should use their professional judgement to identify children who are at risk of radicalisation and act appropriately by referring to the DSL or Deputy DSL, who under normal circumstances will complete the Prevent referral form. If necessary a member of staff can also directly make a referral to the Channel programme using the Prevent

referral or by contacting the Central Referral Unit in Kent (See contact number below) which may include making a referral to the Channel programme via the Central Referral Unit in Kent. The Channel programme focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism.

The duty to prevent people from being drawn into terrorism is known as the Prevent duty and it applies to the school as well as to a wide range of other public facing bodies. The DSL undertakes appropriate Prevent awareness training and is available to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

See *Keeping Children Safe in Education - September 2025* (Annex B) for the details of the Channel programme and the Prevent duty.

### **13.0 Role and responsibility of Governors**

The governing body is accountable for ensuring that the school complies with its legal duties under relevant legislation and contributes to locally agreed multi-agency working. In this connection, the governors will ensure that pupils are provided with early help services where a need is identified either through school provision or through liaison with children's services. Additionally, governors will assist children's services where a child protection plan is in place or where a pupil in the school becomes looked after by the local authority. In the main, governors will ensure that close liaison is maintained with Kent Children's services and LADO as the first point of contact where Early Help or child protection needs are identified and will permit access from Kent children's services and/or the placing authority if this is different.

Governors are also responsible for ensuring that the policies are fully implemented in practice and are reviewed for their effectiveness at least annually and that any deficiencies or weaknesses in child protection arrangements are remedied without delay. The nominated member of the Governing Body is Mrs Georgina Baker who has a leadership responsibility for the college's safeguarding arrangements. Mrs Baker has received suitable training in safeguarding and promotion of welfare. Contact details for designated staff and governors are included in this policy.

The proprietor, MIST also holds strategic accountability for safeguarding and child protection across its schools. MIST has a designated trustee for safeguarding, Lady Fiona Mynors – contact details are included in the [MIST safeguarding policy](#).

It is a recommendation for school staff, governors and trustees to use the DfE Data Protection guidance for schools to understand data protection

### 13.1 Key tasks of the governing body include:

- Ensuring that there is a named designated safeguarding lead (DSL) who is given the time, resources and support to fulfil that role effectively and whose responsibilities as set out in KCSIE annex C are included in their job description.
- Ensuring that any deputy DSLs have their role and responsibilities clearly stated in their job description.
- An annual review of the school's child protection policies and procedures in order to ensure that they enable appropriate action to be taken in a timely manner to safeguard and promote children's welfare; the review is recorded in Governors' minutes and is signed off by the Chairman of Governors.
- That policies are available publicly via the school website.
- Ensuring that the safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Kent Multi Agency Partnership. This includes understanding and reflecting local protocols for assessment and the MAP's threshold document, along with supplying information as requested by the MAP.
- Ensuring the school contributes to multi-agency working in line with [Working Together to safeguard children 2023](#) through the effective implementation of the policy and procedures in practice and good cooperation with local agencies, including effective referral procedures.
- Recognising the importance of information sharing between professionals and local agencies. Whilst the GDPR UK and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully, they are not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Ensuring effective oversight of pupil school attendance and specifically those situations where children go missing and put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.
- Ensuring processes are in place and followed to endeavour for the school to hold more than one emergency contact number for each pupil.
- Ensuring that appropriate recruitment and vetting processes are established and implemented.
- Ensuring there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.
- Ensuring that all staff members undergo safeguarding and child protection training at induction, that their training is regularly updated in line with advice from the Kent MAP, and that they receive child protection updates at least annually.
- Ensuring records are maintained for staff training and safe staff recruitment, and vetting the processes which underpin and inform the annual review of safeguarding arrangements.
- Compliance with Charity Law and the Charity Commission safeguarding guidance 2017

(updated 2021), which includes making a serious incident notification where required

- Compliance with its legal duties under the Human Rights Act 1998 and Equality Act 2010
- The governing body will ensure appropriate filters and appropriate monitoring systems are in place to protect children from inappropriate use and access via electronic media.
- The governing body recognises the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis.
- The governing body will ensure that particular attention is given to the needs of children with special or additional educational needs and will ensure that staff are aware of the barriers which can exist in recognising abuse amongst this group of children. This can include: (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; (b) children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and (c) communication barriers and difficulties in overcoming these barriers.
- The governing body will also ensure that children who are looked after by a local authority and placed at the school are given the appropriate level of help and support, including any issues associated with their protection. Most children who become looked after will have experienced some form of abuse or neglect and staff will be made aware of sensitivities in this regard. This issue will also be included in routine training and induction for staff. The Designated Safeguarding Lead will be the nominated person with responsibility for looked after children and will receive training if a looked after child is to be placed at the school.
- The Governing body will ensure that designated staff maintain close contact with the local authority Virtual School Head with regard to the provision of support to looked after children placed at the school by local authorities.
- Ensure that children are taught about how to keep themselves and others safe, including online, through teaching and learning opportunities, including covering relevant issues through personal, social, health and economic education (PSHE), tutorials, mentor training and through the balanced curriculum.
- Ensure that clear systems and processes are in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

## **14.0 Multi-agency Working**

Kent College recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC 2023)

Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will work together with the safeguarding partners (Social Care, Health and the Police) as described in [Kent Safeguarding Children Multi-agency Partnership Arrangements](#) to support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings, Early Help or other multi-agency meetings.

The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies and ensure appropriate information sharing takes place proactively. [Information Sharing: Guidance for Professionals](#)

## 15.0 Designated Safeguarding Lead(s)

The governing body has appointed a member of the school's senior leadership team to the role of Designated Safeguarding Lead for the Senior School and Junior School. The role of the DSL matches the job description as stated in *Keeping Children Safe in Education (2025)* Annex C.

Please see our safeguarding team [here](#). In the Senior School, this person is Mr Dan Bennett, Deputy Head Wellbeing & Pastoral. Working with him are the Deputy Designated Safeguarding Leads, Bev Pocock (DDSL) House Parent for Austen House/Mental Health Lead and the Heads of Year. The Junior School Designated Safeguarding Lead is Mrs Anouska Blaza, The Designated Safeguarding Lead for Early Years is Mrs Jeanette Goodman. The DDSLs at the Junior School are Mr Simon James, the Head of Junior School, and Mr Chris Sweet, Senior Teacher, Head of PE & Games.

All the team liaises with Kent children's services and police as required by statutory guidance. The Heads of Schools have a role of oversight and operating in conjunction with/supporting the above as necessary. The Medical Centre holds a copy of "*Child Protection: guidance for senior nurses, health visitors and midwives*" (HMSO) and is fully conversant with, and uses, its guidance where relevant to the school setting. The Medical Centre Staff will participate in school INSET concerned with safeguarding and the promotion of child welfare.

The Lead DSL and DDSL will be the primary staff members responsible for working with students who have serious concerns or require involvement with external agencies. However, if deemed appropriate by the DSL, another member of the safeguarding team may be assigned to support the student or family. The purpose of this is to look after the wellbeing of our key safeguarding team.

## 16.0 Early Help

All school staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who is disabled or has certain health conditions and has specific additional needs, has special educational needs (whether or not they have a statutory Education, Health and Care Plan), has a mental health need, is a young carer, is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement

and association with organised crime groups or county lines, is frequently missing/goes missing from care or from home, is at risk of modern slavery, trafficking, sexual or criminal exploitation, is at risk of being radicalised or exploited, has a family member in prison, or is affected by parental offending, is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse, is misusing drugs or alcohol themselves, has returned home to their family from care, is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage, is a privately fostered child, is persistently absent from education, including persistent absences for part of the school day.

Early help within school includes, for example, review at weekly pastoral meetings, meetings with parents, pastoral support plans, involvement from the school counsellor or medical centre, Boarding House Parents, SENCO, Heads of Year, Educational Psychology or other assessments, and where required, outside agencies such as CAMHS and the Kent Education Early Help services.

The DSL and Deputy DSLs are an integral part of the early help process in all parts of the school. All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the Head of Year, Boarding House parent, form tutor, SENCO or DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an Early Help assessment. [KELSI Early Help Services](#)

If Early Help is appropriate the DSL should support the appropriate staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. This might be the Head of year, Form Tutor or House Parent. If Early Help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

## **17.0 Parental or Pupil consent to refer**

The involvement of parents in Early Help for a child is vital and any proposal to share information with other agencies in order to source early help services would be discussed with the parents; should there be an occasion when parents were not in support of proposed Early Help, advice would be sought from the Area Safeguarding Adviser and, if necessary, a referral would be made. Parental or pupil consent is NOT required for a referral to statutory agencies where it is believed that a child is in need (s17) or there are concerns about the child's safety (s47); reference to parental consent must not apply when a child is in need of services or may be at risk of harm. When deciding whether to share information with other agencies, the school will consider whether there is a duty under GDPR UK article 6 'legal obligation and / or public task' and article 9 'substantial public conditions'.

## **18.0 Statutory Assessments**

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local authority's referral process.

### **18.1 Children in Need**

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

### **18.2 Children Suffering or Likely to Suffer Significant Harm**

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

## **19.0 Record keeping**

The school uses CPOMS as a secure online reporting and recording system for child protection and safeguarding matters. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing via CPOMS with any paper or other virtual records being securely uploaded in a timely fashion. If in doubt about recording requirements, staff should discuss with the DSL (or deputy). The Junior school use both CPOMS and paper-based cause of concern form recording system, as the primary way staff record or report any child protection and safeguarding matters, which is discussed with the DSL (or deputy) All decisions and outcomes are uploaded securely to CPOMS by the DSL.

### **19.1 Sharing of Information**

The DSL helps promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. This ensures staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations and helps teaching staff to identify the challenges that such children might face and the additional academic support and

adjustments that the school could make to best support these children.

### **19.2 Why is all of this important?**

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of this poor practice include: failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; not sharing information; sharing information too slowly; and a lack of challenge to those who appear not to be taking action.

### **19.3 Children moving schools or alternative provision**

Should any children move school, either leaving or joining Kent College, we will do whatever we reasonably can to gather from the leaving institution or provide the receiving institution with any relevant welfare and child protection information. This will be especially important where children are vulnerable. As a minimum the receiving institution should, as appropriate, have access to a vulnerable child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is). The child protection records should be transferred within 5 working days of the child joining the school roll. In addition, where the transition is planned, the DSL will also share relevant information verbally with the school or FE college that the child is expected to transfer to / from; this will enable the new school to put in place any support the child and / or family might need.

Any exchanges of information will ideally happen at DSL (or deputy) level and likewise between special educational needs co-ordinators with oversight of SEND provision for children with EHC plans. However, it is acknowledged this may not always be possible. Where this is the case senior leaders should take responsibility. We will continue to have appropriate regard to data protection and GDPR so they do not prevent the sharing of information for the purposes of keeping children safe.

It is important to note that schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider, however providing an alternative provision is not something we do as standard practice at KC.

## **20.0 Guidance in handling concerns raised by children**

### **Key Points to follow if you suspect, or are told, of abuse or neglect:**

Adults looking after children or young people in schools should be aware of the risks of abuse (by adults or other young people – child on child abuse) and take steps to reduce those risks.

Adults (staff or volunteers) in charge of children or young people should know what to do if they suspect that someone is being abused, neglected or if someone tells them that this is happening. It is always important to consider the 'likelihood' of harm as well of what is actually happening to a child, The following key points give a guide on what to do and not to do:

1. **Always stop and listen straight away** to someone who wants to tell you about incidents or suspicions of abuse - remember safeguarding is everyone's responsibility.
2. **Write notes** of what the child told you, as soon as possible after the conversation; generally speaking, you should not make notes while they are speaking - and then contact the DSL who will ask you to make a log on CPOMS. It is important to pass your original notes to the DSL, however rough and even if you wrote on the back of something else (it's what you wrote at the time that may be important later - not a tidier and improved version you wrote up afterwards!). It is important not to investigate as this is the duty of child protection agencies. Where a concern exists this must be reported to the DSL who will decide whether a referral to children's services/police is required. It will be for those agencies to agree to the process for further investigation in accordance with their statutory duties. Do not take photographs of any injuries or make a recording (video or audio) of a child's disclosure.
3. **Do not give a guarantee that you will keep what is said confidential or secret** - if you are told about abuse you have a responsibility to tell the right people to get something done about it (see below). If asked, explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell people who absolutely have to know.
4. **Try to avoid asking leading questions** that might give your own ideas of what might have happened (e.g. "did he do x to you?") - just ask "what do you want to tell me?" or "is there anything else you want to say?" A helpful acronym is TED- "Tell me, explain to me, describe to me..." Although leading questions should be avoided, it is important for staff to know that they can ask a child whether they have been harmed and the nature of that harm.
5. **Let the child know you are listening** – give them your full attention, help them to open up, allow them to dictate the pace and flow of the conversation and reflect back what they have told you – see [NSPCC](#) . Remember that children who have been abused may not be able to recall specific dates or details and may be inconsistent in what they tell you.
6. **Report your concerns** using the **10 minute or same day** rule: if it is urgent, speak to a member of the DSL team within 10 minutes in person or by phone, if it is not urgent, report it before the end of the same day either in person or, for those registered on the system, via CPOMS.

## Senior School

Immediately tell Mr Dan Bennett , Designated Safeguarding Lead, or Mrs Bev Pocock (Deputy Designated Safeguarding Lead), or any of the Heads of Year.

### **Junior School**

Immediately tell Mrs Anouska Blaza (Designated Safeguarding Lead), or Mrs Jeanette Goodman (Designated Safeguarding Lead for Early Years), or Mr Simon James or Mr Chris Sweet (Deputy Designated Safeguarding Leads).

7. **Discuss with the Designated Safeguarding Lead** whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).

8. It is important **not to conduct an investigation** as this is the duty of child protection agencies. Where a concern exists this must be reported to the Designated Safeguarding Lead(s) who will decide whether or not a referral to children's services/LADO/police is required. It will be for those agencies to agree to the process for further investigation in accordance with their statutory duties.

9. As soon as possible (and certainly the same day) the **DSL will refer the matter** if the local criteria for action (threshold) is met to children's services and/or the police if a criminal act is thought to have been committed (helped by your notes). Follow their requests about what to do next. They will set up any necessary investigations, and can advise you - that is their statutory responsibility under the Children Act 1989. Remember, everyone has a **personal responsibility** to report concerns regarding possible harm to children or concerns about the conduct of staff or volunteers. This will normally be through the DSL(s) but can be direct to children's services if it is felt suitable or timely action is not being taken.

10. **Never think abuse is impossible** in our school, or that an accusation against someone you know well and trust is bound to be wrong. Always act on a '**gut feeling**'

11. **Children and young people often tell other young people**, rather than staff or other adults, about abuse and for this reason the Student Executive and all Year 13 mentors receive a safeguarding briefing which includes these key points.

## **21.0 What school staff should do if they have concerns about another staff member who may pose a risk of harm to children**

If staff have safeguarding concerns, including low level concerns, or an allegation is made that a member of staff (including supply staff and volunteers) has behaved in a way that has harmed a child, or may have harmed a child; has possibly committed a criminal offence against or related to a child; has behaved towards a child or children in a way that indicates they may pose a risk of harm to children or may have behaved in a way that indicates they may not be

suitable to work with children. then the matter **must be reported immediately** to the **Head\***. The Head (or DSL in the absence of the Head) must then, without delay, contact the Local Authority Designated Officer (LADO) to discuss the concerns in line with KCSIE Part 4a. **All allegations of abuse made against teachers and other staff must be reported to the LADO immediately and within one working day at the latest. Where it is felt that a criminal act may have taken place the police must also be informed.**

**This should be the Head for staff wholly based at the Senior School and the Head of Junior School for staff wholly based at the Junior School. For staff based across both schools, it can be either. Staff wholly based at Garden Cottage Nursery are covered by their separate policies but the Head could also be contacted.**

If the LADO accepts the referral and instigates a multi-agency process and / or if the Police are to be involved, the Head will notify the MIST CEO without delay.

The LADO in conjunction with children's services and/or the police will then confirm the arrangements for investigating the issues raised. The school will fully comply with these arrangements including maintaining appropriate levels of confidentiality. Where a child has suffered serious harm the police must be contacted from the outset. The school has a duty of care to our employees and would offer support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school is not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that we liaise with relevant parties (this includes supply teachers, volunteers, contractors and people letting our premises). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Should an allegation be made against a serving governor, the school would follow the same procedure that relates to current staff members in conjunction with the guidance of the LADO and the directions within KCSIE part 4.

Should an allegation be made against a supply teacher, the school would make the referral to the LADO and then work with the agency following the guidance of the LADO and the directions within KCSIE Part 4a. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified

Should an allegation be brought against a member of boarding staff leading to suspension pending investigation, arrangements for alternative accommodation away from children will be made.

Where there are concerns or allegations regarding the **Head\*** this should be referred to the Chair of Governors, without informing the Head, who will then be responsible for notifying the

LADO and fully acting on the advice provided. The Chair of governors will also inform the CEO of MIST as soon as the LADO notification has been made. In case of serious harm, the police should be informed from the outset, where conflict of interest in reporting the matter to the Head, this should go to the LADO directly.

Allegations against a teacher who is no longer teaching or allegations of a historical nature (non recent) will be reported directly to the police by the **Head\*** or Chair of Governors. The MIST CEO will then be informed.

On conclusion of a case, the Head will add a record of the allegation, actions and outcome to the MIST / KCC non-recent cases log.

Where a member of staff is dismissed/removed from regulated activity (or would have been if they had not resigned) and the harm test has been met, this should be reported to Disclosure and Barring Service – this may, in some circumstances, include when a member of staff has been suspended. For Professional misconduct this should be reported to the Teaching Regulation Agency or another relevant regulatory body such as the HCPC. The Chair of Governors will also seek advice from the Head and MIST on whether a serious incident notification should be made to the Charity Commission.

## **21. 1 Low Level Concerns**

A Low Level Concern (LLC) 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 or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

At the Senior School, Low Level Concerns should be communicated to the Head. If the Head is not available, the Low-Level concern can be passed on to the DSL. In Junior School, LLCs should be communicated to the Head of Junior School

This is covered by the school’s Low Level Concerns Policy.

## **22.0 Staff Code of Conduct**

The school maintains a Staff Code of Conduct for staff behaviour which provides guidance to staff and volunteers about their behaviour and actions so as to not place pupils and staff at risk of harm or of allegations of harm to a pupil. This includes the following key points:

- a. Staff, including cleaning and maintenance staff, should be sensitive to pupils’ privacy when entering boarding accommodation. Staff of the opposite sex are advised to be accompanied

by an appropriate prefect or other member of staff when entering dormitory areas.

b. 1:1 tuition, music or LAMDA lessons and sports coaching sessions etc, should only take place according to the published schedule and in the designated room; changes should only be made after discussion with the relevant Head of Department. Staff are advised not to make arrangements to meet with individual pupils in private rooms on a regular basis. Staff are further advised not to socialise regularly with pupils and must be aware at all times of their professional responsibilities. A close friendship or exclusive relationship between a member of staff and a pupil of either sex should not occur.

c. Physical contact with pupils can be appropriate in some circumstances, such as giving comfort and reassurance, and restraining children in an emergency. However staff must be aware that innocent actions can be misconstrued and should always seek advice when in doubt.

d. Communication between pupils and adults, whatever method, should take place within clear professional boundaries. This includes the wider use of technology, such as mobile phones, text messaging, e-mails, digital cameras, webcams, websites, social networking sites and blogs.

e. Staff are given clear guidance regarding responsible use of the internet and online safety is a key feature of the ICT Acceptable Use Policy (AUP). The Kent College Online Safety Policy provides further guidance and support for staff with regard to online safety.

f. All staff are required to sign the Acceptable Use Policy regarding appropriate use of new technologies. Click [here](#) to view policy.

g. The school Google Classroom and Google Hangout facilities provide secure, closed social media and instant messaging platforms for educational purposes within the classroom, boarding or school trips, and it is expected that these are the default platforms for use when communicating with pupils or about pupils. Purely educational resource curation platforms such as Scoop.it are acceptable but teachers must be mindful of their responsibility to check the suitability of any resource curated on the site. These should follow the expectations outlined in the staff code of conduct, Online Safety Policy and Staff AUP, be for school related matters only, conducted in a professional manner, and should be closed or deleted as soon as the activity or trip is completed. The default is that a school account or school device should be used for such communications but, in the unlikely event that a personal mobile device was needed to be used due to an emergency, as soon as possible the communication should be transferred to a school device. If there is a need for a longer use of a personal device, then advice should be sought from the Online Safety Coordinator or the Trips Coordinator.

h. Staff are allowed to operate social media sites wholly administered for public facing marketing and publicity purposes under the direction of and with full knowledge of the Senior Management Team of Kent College but must be used with caution and moderated regularly.

Personal information regarding children must be limited to their first names only, and staff should be mindful of any restrictions on individual children being photographed or named at all.

i. House staff are responsible for ensuring that pupils are aware of procedures for getting help when necessary and know the school's complaints procedure. Pupils must have access to private telephones and their mail must be considered as private.

j. Parents and pupils will be made aware of avenues for reporting concerns in relation to child abuse and welfare. This will be recorded in the Kent College handbook. (See "Useful Contacts" appendix).

k. House Staff must keep records of all disciplinary matters, health and accident reports, and any complaints relating to the emotional or developmental welfare of pupils.

l. Staff are expected to discuss with the Head\* any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils. The school will put in place support for staff if needed.

### **23.0 What school staff should do if they have concerns about safeguarding practices within the school**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. The procedure is given in the school's Whistleblowing Policy.

Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them including directly to MIST in line with their whistleblowing (confidential reporting) policy. The [NSPCC what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **24.0 Safer Recruitment, Selection and Disclosures Policy and Procedure**

Kent College is committed to ensure that it develops and maintains a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.

The Governing Body and Leadership Team are responsible for ensuring that the school follows

safer recruitment processes outlined within guidance including changes to Keeping children safe in education 2025 Part 3.

The school is responsible for ensuring that it maintains an accurate Single Central Record (SCR) in line with the Education (Independent School Standards) Regulations 2014.

The Governing Body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. **This applies to Early Years staffing also.**

We are also committed to supporting the statutory guidance from the Department for Education on the application of the Disqualification from Childcare Act 2006 Regulations 2018 in relation to staff and volunteers employed in early- or later-years childcare.

Within a culture of openness, staff are expected to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings or any association in the real world or online which may affect the school's ability to safeguard children. Staff will be supported as needed.

A curriculum vitae (CV) should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.

Checks; We will consider online searches as part of our diligence checks on shortlisted candidates.

## **24.1 Member dismissed**

Where a member of staff, volunteer or contractor has harmed or poses a risk of harm to a child and has been removed from working (paid or unpaid) in regulated activity with children, or would have been removed if he or she had not left, a report will promptly be made to the Disclosure and Barring Service (DBS).

Where an employee is dismissed from teaching work (or would have been dismissed if they had not resigned), a referral will be made to the Teaching Regulatory Authority.

Where a member of staff employed in health or social care is dismissed for falling below their professional standards, a referral will be made to their regulatory body (e.g., NMC, HCPC).

## **24.2 Equality Act 2010**

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

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 particular disadvantages affecting pupils or students with a particular protected characteristic in order 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 - GOV.UK ([www.gov.uk](http://www.gov.uk)), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

## **25.0 Arrangements for Visiting Speakers**

Kent College has several visiting speakers during the school year; in Chapel, Liberal Studies lecture and at other occasions as listed in the school calendar and for PSHE. The School has a responsibility for ensuring that any visiting speakers are appropriately supervised and suitable and a responsibility to pupils to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School takes due care to consider carefully before agreeing to a Visiting Speaker being allowed to attend the School; this may be at an SLT meeting or at the termly calendar meeting. This may include a check of their company website, seeking recommendation from other schools that have used their services, social media checks; if relevant this may also include a DBS or other vetting. The member of staff booking the guest speaker will have to complete the visiting speaker form (found in KC bookmarks).

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, we may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers will sign in at reception and, whilst on the School site, be supervised by a school employee.

## 26.0 EYFS

For staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that appropriate checks including staff self-declaration are carried out to ensure that individuals are not disqualified under the Disqualification under the Childcare Act 2006 Regulations 2018. This forms part of the School's safer recruitment practices. The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date on which the member of staff employed in early- or later-years childcare confirmed that they are not disqualified. References must be completed before the start date of work.

Where a member of staff is found to be disqualified, then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate. The member of staff may contact Ofsted to request a waiver and cannot be employed in early- or later-years childcare while the application is being considered.

Duty to notify Ofsted (EYFS): The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it. The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

Use of mobile phones and cameras: everyone who works in the Early Years department will keep their personal mobile phones locked away during the working day. Only school cameras and school iPad/tablets are to be used to capture photos/videos in the EYFS (Early Years Foundation Stage) and these are not to be removed from school. See [Acceptable Use Policy - Staff](#) policy on use of electronic equipment.

In the EYFS electronic learning journals are used for recording children's progress (Tapestry)

- All EY staff seek permission from the EY Coordinator prior to updating any online learning journal.
- Staff adhere to the guidance provided with the system at all times.
- The Tapestry on-line Learning journey system is hosted on secure dedicated servers based in the UK.

- Access to information stored on Tapestry can only be gained by unique user id and password.

All staff working within EYFS will abide by the school's [Intimate Care Policy](#).

Local child protection agencies must be notified of any serious accident to or the death of any child while in their care, and staff must act on advice from those agencies. Ofsted must also be formally notified of any serious incident of harm to a child in the EYFS.

**Remember that you have a duty to safeguard the welfare of our pupils. Never assume that abuse is impossible in the school, or that an accusation against someone you know well is bound to be wrong. If you suspect a child is being abused physically, emotionally, sexually or is being neglected then you should raise your concerns with the Designated Safeguarding Lead or the deputy Designated Safeguarding Lead as soon as possible.**

## 27.0 Useful key contact details are

### Senior School

Designated Safeguarding Lead	Mr Dan Bennett Deputy Head Pastoral and Wellbeing	<a href="mailto:dsl@kentcollege.co.uk">dsl@kentcollege.co.uk</a> Tel: 07706 343227
Deputy Designated Safeguarding Lead	Mrs Bev Pocock House Parent, Austen House	<a href="mailto:bpocock@kentcollege.co.uk">bpocock@kentcollege.co.uk</a> 01227 813948

### Junior School

Designated Safeguarding Lead for Junior school	Mrs Anouska Blaza Deputy Head & DSL	<a href="mailto:Ablaza@kentcollege.co.uk">Ablaza@kentcollege.co.uk</a> <a href="tel:01227762436">01227 762436</a>
Designated Safeguarding Lead for Early Years	Mrs Jeanette Goodman Head of Early Years	<a href="mailto:jgoodman@kentcollege.co.uk">jgoodman@kentcollege.co.uk</a> <a href="tel:01227762436">01227 762436</a>
Deputy Designated Safeguarding Lead	Mr Simon James Head of Junior School	<a href="mailto:sjames@kentcollege.co.uk">sjames@kentcollege.co.uk</a> <a href="tel:01227762436">01227 762436</a>
Deputy Designated Safeguarding Lead	Mr Chris Sweet Senior Teacher & Head of PE Games	<a href="mailto:csweet@kentcollege.co.uk">csweet@kentcollege.co.uk</a> <a href="tel:01227762436">01227 762436</a>

Chair of Governors	David Bailey	Contactable through the Bursar's office. Dbailey@kentcollege.co.uk 01227 813948
Nominated Governor for Child Protection	Mrs Georgina Baker	Contactable through the Bursar's office 01227 813948 or gbaker@kentcollege.co.uk
Designated Trustee for safeguarding (designate)	Lady Fiona Mynors	Fmynors@methodistschools.org.uk
Local Authority Designated Officer (LADO)		03000 410888
Kent Children's Social Services Department Central Referral Unit	For reporting to Kent Police as well as Social Services (Including concerns re. FGM and radicalisation)	03000 41 11 11 (Out of hours 03000 419191)
Area Safeguarding Adviser (East Kent) Contact for advice and support about extremism and female genital mutilation (FGM)		03000 418503
Police contact for reporting FGM		101
Advice and support about extremism: DfE dedicated helpline and mail box for non emergency advice for staff and governors		020 7340 7264 E-mail: counter-extremism@education.gsi.gov.uk
NSPCC Helpline		0808 800 5000 Female Genital mutilation 0800 028 3550

Childline		0800 1111
The Children's Commissioner for England		0800 528 0731
OFSTED		0300 123 1231
Independent Schools Inspectorate (ISI)		020 7600 0100
Disclosure and Barring Service (DBS)		0870 909 0811
Department for Education - Teacher Regulation Agency (TRA)		0370 000 2288
Independent Listeners	Jane Wright Anna Ostle	<a href="mailto:boughurst@yahoo.co.uk">boughurst@yahoo.co.uk</a> <a href="mailto:annaostle@icloud.com">annaostle@icloud.com</a>
Local Authority Virtual Schools Kent Assist. Head for Looked After Children in Canterbury,  Local Authority Virtual Schools Kent Deputy Head for Looked after Children in East Kent	Gina Turner  Anne Parnell	07920 526 551 or 03000 419420  07710 333231 or 03000 418715
NSPCC Whistleblowing helpline		0800 028 0285
Charity Commission	Serious incident notifications  Whistleblowing service	<a href="https://register-of-charities.charitycommission.gov.uk/report-a-serious-incident">https://register-of-charities.charitycommission.gov.uk/report-a-serious-incident</a>  <a href="mailto:whistleblowing@charitycommission.gov.uk">whistleblowing@charitycommission.gov.uk</a>

## Appendix 1: Signs of abuse and neglect

### **A child may be experiencing abuse if he or she is:**

- Frequently dirty, hungry or inadequately dressed
- Left in unsafe situations, or without medical attention
- Constantly "put down," insulted, sworn at or humiliated
- Seems afraid of parents or carers
- Severely bruised or injured
- Displays sexual behaviour which doesn't seem appropriate for their age
- Growing up in a home where there is domestic violence
- Living with parents or carers involved in serious drug or alcohol abuse

Remember, this list does not cover every child abuse possibility. You may have seen other things in the child's behaviour or circumstances that worry you. Abuse is always wrong and it is never the young person's fault.

### **Signs and behaviours which may indicate that a child is being abused:**

- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- relationships between child and adults which are secretive and exclude others
- pregnancy

These signs are not evidence themselves, but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs.

## **Appendix 2: KCSIE**

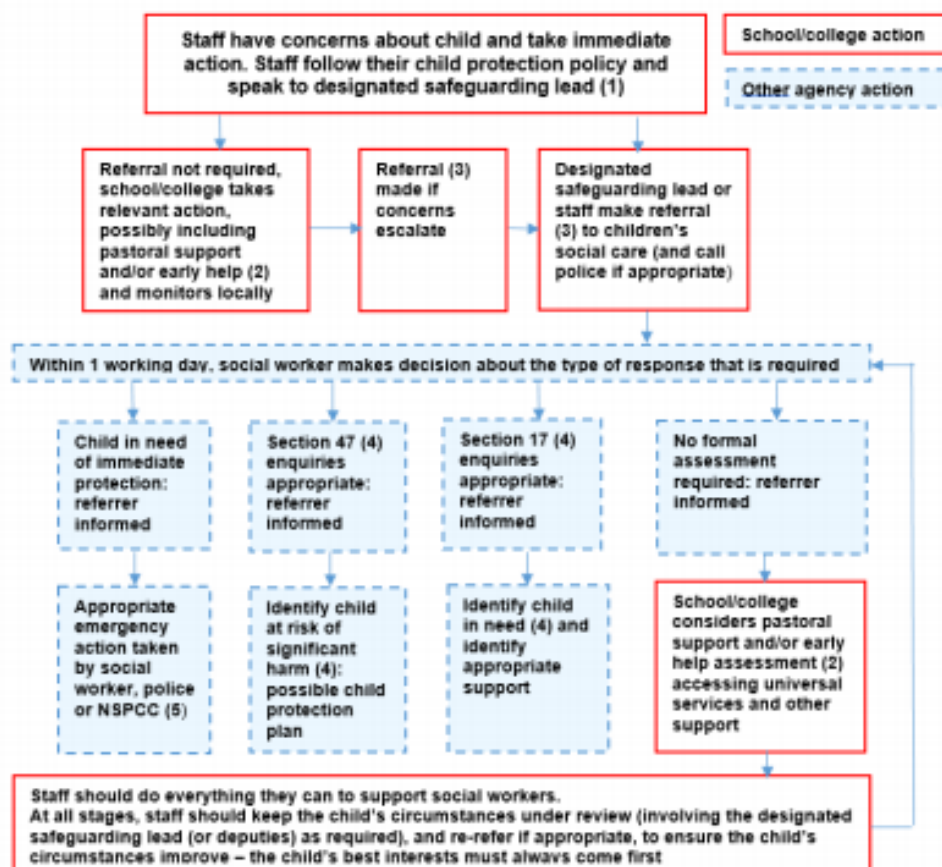
[Keeping Children Safe in Education September 2025](#)

## **Appendix 3: Role of the Designated Safeguarding Lead**

## Role of the Designated Safeguarding Lead

### Appendix 4: Actions where there are concerns about a child

#### Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## **Appendix 5: Covid 19 Addendum**

KCSIE is statutory safeguarding guidance that schools and colleges should continue to have regard to as per their legislative duty and/or funding agreement requirements during the closure of schools due to Covid 19 and during re-opening or any localised closure or partial closures.

Whilst acknowledging the pressure that schools and colleges are under, it remains essential that as far as possible they continue to be safe places for children. The government guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads (DSLs) so they can continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider safeguarding policy and process differently when compared to business as usual.

The way schools and colleges are currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children must always continue to come first
- if anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately
- a DSL or deputy should be available
- it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- children should continue to be protected when they are online

Schools and colleges should, as far as is reasonably possible, take a whole institution approach to safeguarding. This will allow them to satisfy themselves that any new policies and processes in response to COVID-19 are not weakening their approach to safeguarding or undermining their child protection policy.

Our policy has these additions that apply during the Covid 19 situation

### **Advice from local safeguarding partners**

The school will follow any updated advice received from the local 3 safeguarding partners and updated advice received from Kent Local Authority regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

### **What to do if staff have concerns about a child**

Staff and volunteers have been reminded about what they should do if they have any concerns about a child and the continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns.

### **DSL (and deputy) arrangements**

All members of the DSL team continue to be available for consultation by telephone via the normal

numbers and all parts of the school continue to have at least 1 member of the DSL team living on site. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

**The school will continue to:**

- Work with and support children’s social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children
- Manage any report of child on child abuse and supporting victims
- Remind staff and volunteers what they should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children- the Head of each part of the school continue to be available
- Support children the school is concerned about who do not meet the ‘vulnerable’ definition
- Use the form tutor and pastoral system, to keep in touch with children not physically attending school to keep them safe, especially online and to report concerns about these children to the DSL using normal processes
- Make staff and volunteers aware of changes to this policy and are kept up to date as it is revised. The revised policy continues to be made available publicly on the school website.

The DSL team will continue to consider the following in a child protection context

**Vulnerable children:** Ensuring that vulnerable children remain protected is a top priority for the government. Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans. Local authorities have the key day-to-day responsibility for delivery of children’s social care. Social workers and VSHs will continue to work with vulnerable children in this difficult period and should support these children to access this provision. There is an expectation that children with a social worker will attend provision, unless in consultation with the child’s social worker and family it is agreed this is not in the best interests of the child. The school will continue to offer places to attend provision for the children of critical care workers and vulnerable children as determined best for each child in consultation with the relevant authorities; this might be on either the Junior or Senior school site.

**Attendance:** The school will follow the government requirements for recording attendance, noting changes to processes and procedures as notified by updates to the guidance provided.

**Mental health**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Teachers should be aware of this in setting expectations of pupils’ work where they are at home.

Support for children of critical workers and vulnerable children on site is in place as it is for the rest of the school, who continue to be able to access the School Counsellors as before, but using remote secure access and following BACP ethics and school guidelines. Children receiving specialist help or needing referrals for specialist help will continue to be supported and referred.

**Online Safety**

The school continues to take online safety very seriously, especially during the period of remote learning and reminders have been given to parents and carers to ensure appropriate filters and monitoring systems are in place at home to protect children; these continue to be in place at school and for any

VPN service established for students not in the UK. The school has continued technical support for both infrastructure and learning platforms during the Covid-19 situation, with contingency built into the arrangements.

Guidance from the Local Authority Area Online Safeguarding Adviser on how parents can help keep their children safe has been shared with parents, guardians and staff along with a list of useful sites, including sites to assist parents in talking to their children about online safety within the home.

All staff who interact with children, including online, will continue to look out for signs a child may be at risk and report any concerns to the DSL team.

The starting point for online teaching should be that the same principles as set out in the school staff a code of conduct and the Online Safety Policy. Staff who are interacting with children online have been given additional guidance on how to work safely remotely with children, and this has been provided to Visiting Music Teachers and LAMDA teachers.

Children working online have been taught how to report concerns via CEOP or to go to Childline for support; additionally, those working with them remotely are able to check if they have any concerns whilst online.

Please see our online [safety policy](#) for more details

## **Appendix 6: Scenarios relating to Child Protection**

### **Jenny Year 7**

*Scenario:* Jenny is normally a happy and healthy Year 7 pupil. Her tutor has noticed that recently she often has bruises on her legs. The tutor noticed it over a period of three weeks, taking little notice initially as children often have bruises. However, the tutor noted that they appeared at the beginning of the week. She spoke to Jenny about them and Jenny said that she had bumped into things. The tutor was not satisfied and spoke to Jenny's PE teacher, asking her to look out for any other bruising. The PE teacher noticed when Jenny had her PE shirt on that she also had bruises on the fleshy parts of the inside of her upper arm as well. Jenny started to get quieter in school. Her homework was not always done over the weekends.

*Action:* The tutor had noted her concerns and her initial actions and their results. She decided she needed to speak to the DSL and seek further guidance. The DSL agreed there was clear cause for concern and that action should be taken. The DSL spoke to Jenny's Head of Year. The DSL contacted KCC Safeguarding team for a consultation and the school was asked to monitor the situation and contact the home to explain our concerns. The DSL contacted Jenny's mother to explain our concerns and to also inform her that a conversation had taken place with the safeguarding team.

The mother told the DSL that things were difficult within the family. Money was very tight and the father was working away from home during the week. When he came home he was very tired and had little patience with Jenny. He had got hold of her arms on one occasion and shook her. Jenny's mother was shocked to hear that this had resulted in bruising. She said she did not know what to do. The DSL considered that the family needed support to ensure Jenny's safety and suggested to the mother that children's Services may be able to offer them some support to assist with their situation. The mother agreed and a referral was made to KCC Front Door by the DSL.

*Outcome:* A meeting took place between Social Services and the family. Jenny was recognised as a child in need

and the family was given support and debt counselling. The bruising stopped. They continue to live together and Jenny returned to her previous happy and healthy self.

## **Michael      Year 10**

*Scenario:* Mr James, while on duty in the Dining Room, noticed that Michael was an excessive eater. He would not only eat his own food in record time, but would swoop upon anyone else's and demolish that as well. Some other children were clearly getting fed-up with him hanging around for their food, and this was leading to difficulties in relationships.

Mr James had a quiet word with Michael, with an intention to focus mainly upon healthy eating issues and about leaving the other children to get on with their lunch in peace. However, he was amazed at how uptight Michael was in his response to him. Michael told him that his Mum was bringing him and his younger brothers and sister up on her own, as Dad had walked out on them. He explained that she worked all day when they were at school, and then went on to an evening job. She was never home before 11p.m. Michael therefore was responsible for looking after his siblings. He cooked for them and fed them, but his Mum never left him enough money for them all so he went without. He got free school lunches, so he tried to make do with just one meal per day.

*Action:* Mr James spoke to Michael's tutor who had concerns about Michael. He was coming in late in the mornings, and there were reports beginning to come in about him truanting from Period 6. Mr James and the tutor made notes about their concerns.

The tutor spoke to Michael who told her the whole story. He was looking after his siblings, aged 8, 9 and 11. He took the little ones to school and picked them up on certain days and his 11 year old sister did the other days. Michael did all the cooking and the housework.

The school had already written to Michael's mother regarding his truancy and lateness but no reply had been received. Early Help support had not been able to gain access to the house.

The tutor spoke to the DSL and passed on the detailed notes relating to the concerns. A referral was made to KCC Front Door.

*Outcome:* Michael's mother was contacted by Early Help and a meeting took place. After a while it was clear that the mother was not going to change her behaviour and it was decided to accommodate the children. The children remained in their schools. Michael's truancy stopped, but his behaviour deteriorated. He received counselling.

## **Mr Miles      Teacher**

*Scenario:* Mr Miles was a popular teacher. During the September of a new school year he received a card from a child who had left school the previous term. The card was from a girl who had been in his Year 11 GCSE group. In the card she said that she had always liked him and thought that he liked her too. She thought that as she had then left school it would be all right for them to meet and for them to go out for a drink together. In the card she included her mobile phone number and asked him to contact her. She had sent the card to his home address. She knew that he lived in the same town as the school and got his address from the telephone directory.

*Action:* Mr Miles immediately went to see a Deputy Headteacher, taking the card with him. He explained what had happened and how shocked he was to have received the card that morning. He was at pains to emphasise that he had always had a totally professional relationship with the children he taught and she had misread this relationship. He showed the Deputy Headteacher the card.

The Deputy Headteacher thanked him for his prompt and very sensible response. The Deputy Headteacher rang the girl's home immediately and spoke to her mother. The mother was shocked by her daughter's actions and assured the Deputy Headteacher that her daughter would be making no further contact with Mr Miles. She asked that her apologies were passed on. It was also agreed that if her daughter made any further contact she would

be informed.

*Outcome:* Mr Miles had no further contact from the girl. His prompt action had stopped the situation from developing.

During a conversation in the staff room several weeks later Mr Miles found out from another of the girl's teachers that the girl had written big 'love hearts' with CC (her initials) loves John Miles written around them, all over her exercise books for that subject. The teacher concerned should have responded to this immediately. The girl should have been asked to remove them from her books and been spoken to about how inappropriate her comments had been. Her tutor should have been informed also. The girl needed to have understood immediately the nature of the professional relationship between teachers and school children, and importantly that there was no scope for anything else. If the teacher who had seen the 'love hearts' felt unable to do this she should have spoken to the girl's tutor or Head of Year. Mr Miles should also have been informed so that he could have spoken to the girl or sought support.

## **Zayn Year 10**

*Scenario:* The school is concerned about a pupil called Zayn. He is a 15 year-old boy who has admitted to his form tutor that he has been viewing jihadist videos online and he says that he wants to travel abroad to Syria.

Zayn has learning difficulties and he had been bullied by others in his class. As a result he has become very isolated and does not appear to have any friends at school.

During the conversation which concerned his form tutor Zayn said that he "wanted to help his brothers and sisters who are being murdered".

*Action:* The school met with Zayn's mother who admitted that she was having difficulty in caring for him. She and Zayn had let his father a couple of months previously as he used to beat her. She mentioned that he was missing his father and was spending a lot of time on his own in his room on his computer.

*Outcome:* The school referred Zayn to the Prevent process and a support package was put into place. This included:

- Referral to Social Services for parenting classes for Zayn's mother
- Monitoring of the educational support for his learning difficulties
- Monitoring his access to computers at home and at school
- Providing information on reputable charities working in Syria via 'Safer Giving'
- Referral to a Victim Support domestic violence counsellor for his mother
- Arranged supervised contact with his father

## **Anna Year 9**

*Scenario:* Anna came to the school as a transfer from a local seaside town. She was an Eastern European girl aged 14 years and 7 months on entry. Her younger sister aged 8 had also moved to the area and was attending a local primary school. Both girls were in Local Authority care as a result of concerns re trafficking/marriage preparation raised by Anna's previous school.

*Action:* An initial meeting took place involving the carers, Virtual Schools, Social Services and the school where the issues around the placement were explored. Anna was present for the majority of the meeting.

Both Anna and her younger sibling initially settled in well with her carers and at their schools but a number of issues surrounding Anna rapidly began to emerge. Anna began to abscond from her carers – mainly at weekends

- and she would not reappear for some days. Her school friends at the school were showing signs of concern that they could not contact her.

*Action:* Police and social Services were informed each time Anna went missing. A number of Multi-Agency meetings were held both in Canterbury and in Shepway. Police were concerned that Anna was residing in her local ethnic community when she was absconding but were unable to trace her. Concerns were raised that she was being prepared for marriage back in her parents' homeland. Anna continued to abscond and was adamant that she wished to return to her parents' care. Her younger sibling was equally adamant that she wished to remain in care.

After obtaining assurances from the family as to her future, Social Services made the decision to return Anna to her parents and she left the school to return to them. Social Services continue to monitor Anna's welfare.

## Appendix 7: Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:  
The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
  - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
  - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
  - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include
  - Being in contact with extremist recruiters;
  - Accessing violent extremist websites, especially those with a social networking element;
  - Possessing or accessing violent extremist literature;
  - Using extremist narratives and a global ideology to explain personal disadvantage;
  - Justifying the use of violence to solve societal issues;
  - Joining or seeking to join extremist organisations;
  - Significant changes to appearance and / or behaviour;
  - Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.