

ENGLISH MARTYRS' RC PRIMARY SCHOOL



Child Protection and Safeguarding Policy 2024 - 2025

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and can demonstrate they have read and understand their safeguarding responsibilities.

Date of last review:	July-24	Date of next review:	July-25
Author:	Policy & Projects Mgr Safeguarding & Wellbeing Mgr	Owner:	Chief Executive Officer
Type of policy:	Trust-wide	Approval:	Board of Directors

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

Key Contacts

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Local Safeguarding Partners		
First Response & SPA	For urgent child protection concerns	01634 334466 (Monday to Friday from 9am to 5pm)
First Response/ Family Solutions	To request non-urgent support	Portal
Out of Hours – Emergency Duty Team	For urgent child protection concerns	03000 419 191
Kent Police	Emergency situations	999 for urgent matters
Local Authority Designated Officer	Allegations against adults in school	01634 331065 LADO referral
Education Safeguarding Service	Advice/Training/ Reviews	01634 331464 or 01634 331017 educsafeguarding@medway.gov.uk
Medway Safeguarding Children Partnership (MSCP)	Links to key Medway safeguarding documents, training and processes	01634 336 329 mscp@medway.gov.uk
Prevent Education Officer	Prevent advice & training	Sally.Green2@kent.gov.uk
National Contacts		
NSPCC Whistleblowing Helpline	Free advice and support to professionals about how CP issues are being handled in their own or other organisation.	0800 028 0285 help@nspcc.org.uk

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Mission Statement

As a Roman Catholic school, we create an atmosphere in which children can grow into the fullness of their faith. We develop their understanding of, and respect for, people of all faiths and cultures. We value parents as children’s first teachers. We aim to educate our pupils in every way so that they are friendly, spiritual and caring individuals who enjoy learning and achieve their potential in all areas. We provide a welcoming, safe environment in which children learn to speak and behave properly and to care for and comfort others. We encourage the children to carry these lessons with them into their everyday lives whilst they are at our school and when they move on.

1. What to do if you have a concern about a child at EMRCP

Why are you concerned?

For example:

- Allegation/ child shares a concern or worry
- Indicators of abuse or neglect
- Changes in behaviour

Immediately record your concerns

Follow the school's procedure (record details on CPOMs)

- Reassure the child
- Clarify concerns if necessary (**TED**: Tell, Explain, Describe)
- Use child's own words/ use facts
- Seek support for yourself, if required from DSL

Inform the Designated Safeguarding Lead (Catherine Thacker, Headteacher)

Designated Safeguarding Lead

- Consider whether the child has suffered, or is at immediate risk of, harm e.g. unsafe to go home
- If the child **is at imminent risk of harm**, **make** a telephone contact to First Response – 01634 334466 (out of working hours contact Out of Hours on 03000 41 91 91) 033and/or call 999.
- If your concern is high, but the child is **NOT** at imminent risk, or for Family Solutions referrals use the [portal](#)
- For early help, consider if internal support or referral to other agencies is appropriate
- Use the MSCP [Threshold Guidance](#) .
- '**No Names Consultation line**' 9:30 – 12:30 term time (01634 33 1662) for advice on non-urgent queries only.

Record decision making and action taken in the pupil/student's Child Protection/safeguarding file

Monitor - Be clear about:

- What **ACTION** you have taken at the time of reporting the concerns, and why.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Who is responsible
- Where, how and to whom you will feedback and how you will record

At all stages the child's situation will be kept under review (*if necessary*)

The DSL/Staff will request further support if required to ensure the child's safety is paramount

If you are unhappy with the response DSL/Staff:

- Follow [MSCP escalation procedures](#)
- Follow Whistleblowing procedures (school policy available on website)

Pupils/Students and Parents:

- Follow school complaints procedures (school policy available on website)

2. Introduction, Aims and Ethos

Procedures in this policy apply to all staff, including temporary or agency staff, students on placement, governors and volunteers and are consistent with Keeping Children Safe in Education 2024

Kent Catholic Schools' Partnership ("the Trust") and each of its Schools is a community and all those directly connected (staff, governance committee members, directors, clergy, volunteers, families and pupils) have an essential role to play in making it safe and secure.

The Trust recognise the importance of providing a Catholic ethos and environment within the school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to.

The child's welfare is paramount, and the Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues.

English Martyrs' RC Primary School recognises their statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

English Martyrs' RC Primary School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school, children are respected and encourage to talk openly. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings considered and all children regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.

Our school acknowledges the need to treat everyone with equity, with fairness, dignity and respect. We recognise that unconscious bias may impact upon our perceptions and expectations of children, particularly those from minority groups and that this may influence the safeguarding actions we take. We seek to educate and challenge all members of the school community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness.

Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include girls, pupils/students who are, or are perceived to be Lesbian, Gay, Bisexual, Trans or gender questioning, and pupils/students with SEND. We recognise that these children can be targeted by other children and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Pupils/students are protected from up-skirting, bullying (including cyberbullying), homophobic, bi-phobic and transphobic behaviour, racism, sexism, and all other forms of discrimination. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.

Through their day-to-day contact with pupils/students and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse, neglect and/or exploitation at an early stage. Our school may be the only secure, stable, and predictable element in their lives.

English Martyrs' RC Primary School will endeavour to support the welfare and safety of all pupils/students through:

- Ensuring that the child's welfare is of paramount importance.
- Training all staff to recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
- Ensuring that children's mental and physical health, or development, is not impaired.
- Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) to help pupils/students stay safe, recognise when they don't feel safe and identify who they might / can talk to.
- Working with parents to ensure they understand the school's legal responsibility to safeguard and ensure the welfare of all children, including the need for referral to other agencies in some situations.
- Keeping confidential records that are stored securely and shared appropriately with other professionals.
- Ensuring the voice of the child is evident in individual case files and informs the school's policy developments.
- Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors and contractors.
- Informing parents about expected behaviour.

English Martyrs' RC Primary School expects that if any member of our community has a safeguarding concern about any child or adult, they will act immediately.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2024 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2024.

3. Policy Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
 - DfE Keeping Children Safe in Education 2024 (KCSIE)
 - Working Together to Safeguard Children (WTSC) 2023
 - Ofsted: Education Inspection Framework 2019
 - Framework for the Assessment of Children in Need and their Families 2000)
 - [Kent and Medway Safeguarding Children Procedures](#)
 - Early Years and Foundation Stage Framework 2021 (EYFS)
 - The Education Act 2002
- [Sections 175 and 157 of the Education Act 2002](#) require school governing bodies, proprietors, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils or

students at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

- This policy has due regard to the:
 - Human Rights Act 1998
 - Equality Act 2010
 - Public Sector Equality Duty (PSED)

4. Definition of Safeguarding

Safeguarding children is defined in Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2024 as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

(Children includes everyone under the age of 18)

Child Protection – is a part of safeguarding and is defined as activity undertaken to protect specific children from significant harm. this includes harm inside or outside the home or online.

5. Key Responsibilities

Everyone who comes into contact with children and their families has a role to play in keeping children safe. **The role of every individual at the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.**

This policy applies to all staff, volunteers and governance committee members in the Trust and is consistent with the procedures of the three safeguarding partners: the local authority, local clinical commissioning group, and the Police. This policy and procedures also apply to extended school and off-site activities.

5.1 Governance and Leadership

The Trust Lead Safeguarding Officer is responsible for:

- setting the Trust Safeguarding Strategy and Business Plan Objectives
- 1:1 line management of Directors of Education
- supporting Education Directors in the escalation of any concerns and providing advice & guidance as appropriate
- ensuring Trust safeguarding policies and procedures are updated annually or sooner when required
- ensuring there is appropriate funding for safeguarding
- ensuring safeguarding is accurately reported to the Trust Board

- ensuring a mechanism of safeguarding audit, internal and external, is in place
- managing allegations of abuse against senior staff following the advice of the LADO

The Trust Safeguarding & Wellbeing Manager is responsible for:

- liaising with Kent County Council, Medway council, The Front Door, Medway MASH teams to ensure the Trust DSLs and Deputy DSLs have access to all support available
- working with central team members and wider Trust team to ensure safeguarding compliance across the Trust
- ensuring system of annual reporting exists and to use termly DSL/Governance Committee Reports to monitor safeguarding activity within schools
- providing termly reports on behalf of the CEO to Trust Safeguarding Director and Trust Board and make any necessary recommendations
- meeting termly with the Trust Safeguarding Director to enable check and challenge
- ensuring quality of safeguarding training and support to schools
- support schools in the management of safeguarding systems and software management

The Trust Board will:

- facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- attend regular training that equips them with the knowledge to provide strategic challenge
- appoint a Board Director with responsibility for safeguarding
- evaluate the effectiveness of this Policy and regularly review and approve the Policy
- receive reports from the Trust Lead Safeguarding Director and the Trust Lead Safeguarding Officer regarding the impact of this policy and take decisions on any recommended actions
- be aware of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the responsibilities to process personal information fairly and lawfully and to keep information held, safe and secure.

The Trust Lead Safeguarding Director:

- is appointed by the Trust Board
- attends Board/Education Standards Committee where safeguarding matters discussed
- meets termly with the Trust Safeguarding Officer; Trust Safeguarding & Wellbeing Manager and Director of Governance
- ensures reports and policies are presented to the Board/Committee for review
- supports the Board to understand safeguarding and child protection matters

The Directors of Education will:

- undertake 1:1 line management of Area School Improvement Partners
- review school improvement reports in relation to safeguarding and ensure plans for improvement are in place
- ensure staff welfare is monitored and a supervision provision for safeguarding leads is in place
- review school Annual Safeguarding Reports and commission any internal/external audits
- manage allegations of abuse against senior staff

The Area Schools Improvement Partner will:

- 1:1 Line management of Headteacher
- ensure KCSIE compliance and effective child protection/safeguarding systems, processes and procedures are in place in schools through checking, monitoring and review
- ensure schools Safer Recruitment procedures are in place through SCR checking and monitoring
- ensure effective annual safeguarding training is in place
- ensure review and implementation of recommendations from internal or external audits or reviews_

The Headteacher will:

- ensure KCSIE compliance and effective child protection/safeguarding systems, processes and procedures are in place in schools
- ensure schools Safer Recruitment procedures are in place including SCR management
- ensure a whole-school approach to:
 - safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
 - Preparing pupils for life in modern Britain and a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment underpinned by:
 - The school behaviour policy
 - a pastoral support system
 - a planned programme of RSHE delivered regularly to tackle issues age-appropriately such as: boundaries; consent; body confidence; stereotyping; and sexual harassment
- ensure that staff (including temporary staff and volunteers):
 - are informed of our systems which support safeguarding, including this policy, as part of their induction
 - understand and follow the procedures included in this policy, particularly those concerning referral of cases of suspected abuse, neglect and exploitation
 - undertake appropriate safeguarding and child protection training
- communicate this policy to parents/carers when their child joins the school and via the school website
- ensure that the DSL is properly supported in this role in respect of both dedicated time and resources to deliver the role effectively, and check that required actions have been taken
- ensure weekly DSL update meetings are conducted with SLT to discuss and review live cases
- ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family
- Ensure the academic progress and attainment of vulnerable children (those with a social worker) is maintained and that necessary support and adjustments are in place
- undertake Designated Safeguarding Lead training every two years
- ensure that this Policy is effective and interlinks with related policies
- ensure that locally agreed procedures are in place and being followed
- Regularly, at least annually, review and ensure the effectiveness of school filters and monitoring systems
- work to establish strong and co-operative relationships with relevant professionals in other agencies

- ensure the DSL provides an annual safeguarding report to the Local Governance Committee and the Trust Safeguarding Officer that includes details of safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained
- ensure that the Single Central Record is accurate and up to date by carrying out regular checks
- review and implement recommendations from internal or external reviews and audits.

The Lead Safeguarding Governance Committee Member will:

- liaise regularly with the DSL
- ensure that this policy is reviewed and noted by the governance committee
- support the governance committee to understand child protection and safeguarding issues
- ensure whole school annual safeguarding training takes place and is included in the induction process for new staff
- receive regular termly and annual reports from the DSL for the governance committee regarding the monitoring of and adherence to this policy
- ensure that the school safer recruitment processes include the checking and monitoring of the SCR check, and review annually, that effective filtering and monitoring systems are in place
- attend regular training that equips them with the knowledge to provide strategic challenge
- monitor the implementation of recommendations from internal or external reviews or audits.

Mrs Kate Taylor is the nominated governor for safeguarding, who takes the lead role in ensuring that: the school has an effective policy which interlinks with related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

The Governance Committee will:

- facilitate a whole school approach to safeguarding. They ensure safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development; so that all systems, processes and policies operate with the best interests of the child at their heart.
- have regard to the guidance in KCSIE and will ensure our policies, procedures and training is effective and always complies with the law.
- appoint a governance committee member to be the safeguarding lead for the governance committee
- attend regular and Trust mandated training that equips them with the knowledge to provide strategic challenge
- **ensure that all** members receive safeguarding and child protection (including online safety) training, appropriate to their role at induction. This training is regularly updated and equips them with the knowledge to provide strategic challenge; to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.
- review the implementation of recommendations from internal or external reviews or audits
- review the termly and annual safeguarding reports received.
- regularly review the effectiveness of school filtering and monitoring systems, at least annually. They/l 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.
- ensure that the DSL is suitably supported in their role; has the appropriate status, authority, funding, resources, and training. They assure themselves that the DSL understands they have the responsibility in leading safeguarding and child protection across the school.

5.2 Designated Safeguarding Lead (DSL) and Deputy DSL

The school has appointed Catherine Thacker, Headteacher, as the Designated Safeguarding Lead (DSL). They are a member of the senior leadership team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school.

The school has appointed two Deputy DSLs (DDSLs), who have delegated responsibilities and act in the DSL's absence.

Whilst the activities of the DSL may be delegated to the deputies, the ultimate **lead responsibility** for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL carries out their role as identified in Appendix C of Keeping Children Safe in Education, (P170) 2024, these duties are set out in their job description.

The Designated Safeguarding Lead undergoes appropriate training to provide them with the knowledge and skills required to carry out their role. DDSLs are trained to the same standard as the DSL. Accredited DSL training, specific to the role, is renewed every two years. Knowledge and skills are updated at regular intervals, **at least annually**, according to the needs of the school

The Headteacher is kept informed of any significant issues by the DSL.

Availability - during term time the DSL (or a DDSL) is always available (during school hours) for school staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements are made for school trips and any out of hours/out of term activities. During school holidays, the DSL will provide appropriate emergency contact details to the MASH Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.

It is the role of the DSL to:

- Act as main contact point for all school staff to discuss any safeguarding concerns.
- Manage and maintain the confidential paper/electronic case management systems to record concerns about pupils/students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
- Coordinate safeguarding action for individual children. In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
- Liaise with the Headteacher or principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This

includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)

- To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2024 and WTSC 2023.
- Ensure that Medway referral procedures are followed as necessary (see referral process [page 2](#)).
- As required, represent and liaise appropriately with other professionals and ensure the school is represented at multi-agency safeguarding meetings (including child protection conferences).
- Act as a source of support, advice and expertise for all staff during term time for staff in the school to be able to discuss any safeguarding concerns.
- Understand the importance of information sharing both within the school and with other schools and agencies.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2024
- Produce data and information for governance committee meetings including the annual report for to Governance committee and the Trust Lead Safeguarding Director/Officer regarding the monitoring and adherence to this Policy. Templates for the annual report can be requested from office@kcsp.org.uk

The role of the deputy DSLs includes:

- being available during term time and school hours for staff to discuss any safeguarding concerns
- maintaining the “CPOMS” electronic system regarding individual children
- recording on CPOMS instances where a child has a social worker, and use this information in the best interest of the child’s safety, welfare and educational outcomes, such as when decisions are made on:
 - responding to unauthorised absence or unexplainable and/or persistent absences from education where there are known safeguarding risks
 - the provision of pastoral and/or academic support
- regularly monitor the effectiveness of school filters and monitoring systems and escalate any concerns when identified
- making immediate and on-going assessments of potential risk
- co-ordinating safeguarding action for individual children, including involving the SENCO in any concerns, suspected abuse or abuse involving children with SEND
- liaising with other agencies and professionals
- ensuring that locally established procedures are followed and making referrals as necessary
- awareness of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence including:
 - communicating any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded [state where, for example, on CPOMS].
 - If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.
- undertaking DSL training every two years

- representing or ensuring the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
- managing and monitoring the school's part in Early Help/Child in Need/Child Protection plans
- help promote educational outcomes by
 - sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.
 - Ensuring leadership and teaching staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
 - supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- responsibility for monitoring the safeguarding of pupils educated offsite.

5.3 Members of Staff

The welfare and safety of children is the responsibility of all staff in school. ANY concern for a pupil's welfare MUST be reported to the Designated Safeguarding Lead.

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn and promote the child's welfare.
- Maintain an attitude of **'it could happen here'** where safeguarding is concerned and to always act in the best interests of the child.
- Understand the early help process and their role in it.
- Be aware of the indicators of abuse, neglect and exploitation, so they can identify cases of children who may need help or protection.
- Understand that children may not feel ready to or know how to tell someone they are being abused, exploited, or neglected and/or that they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. They may feel embarrassed, humiliated or be being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns any about a child.
- Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Build trusting relationships which facilitate communication with children and young people.
- Know what to do if a child tells them that he or she is being abused, neglected or exploited and understand the impact abuse and neglect can have upon a child.
- Know how to maintain an appropriate level of confidentiality.
- Understand and comply with this policy and understand other safeguarding policies and systems, including the Trust Code of Conduct and part 1 and Annex B of the Department for Education's statutory safeguarding guidance 'Keeping Children Safe in Education', review this annually and sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Staff help improve and enhance the safeguarding policy through their contributions and development
- To undertake regular and appropriate training, that is regularly updated.

- Be aware of, and take appropriate action to raise concerns, about poor or unsafe practice, or potential failures in the school safeguarding regime. (This may include accessing the school whistleblowing policy)

5.4 Children and Young People

Children and young people (pupils/students) have a right to:

- Contribute to the development of school safeguarding policies.
- Report abuse confidently, knowing concerns will be taken seriously and that they will be listened to, and that effective action will be taken.
- Seek help from a trusted adult and feel listened to.
- Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

5.5 Parents and Carers

Parents/carers have a responsibility to:

- Work in partnership with the school to safeguard and promote the welfare of child/ren and understand English Martyrs' RC Primary School's statutory responsibilities in this area.
- Read and adhere to the relevant school/policies and procedures.
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm, including online
- Follow the procedure for lodging complaints to address issues and guarantee English Martyrs' RC Primary School's prompt response.
- Seek help and support from the school, or other appropriate agencies.
- We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality, and will not share sensitive information, unless we have permission, or it is necessary to do so to protect a child/children.

6. Child Protection and Safeguarding Procedures

6.1 Recognising Indicators of Abuse, Neglect and Exploitation

As a school we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. This is outlined locally within the [Medway Threshold Guidance](#).

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 (or a deputy). All staff in school are aware of the definitions and indicators of abuse and neglect.

There are four categories of abuse:

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.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.
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.
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.

The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to [What to do if you are worried a child is being abused 2018](#).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. Indicators of abuse, neglect and exploitation do not automatically mean a child is being abused, however all concerns should be taken seriously, reported and explored by the DSL on a case-by-case basis.

The warning signs and symptoms of child abuse, neglect and exploitation will vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child, might be normal for an older child.

English Martyrs' RC Primary School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

All staff, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. **Extra-familial harms** take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.

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

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

7. Specific Safeguarding Issues

- English Martyrs' RC Primary School is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- English Martyrs' RC Primary School staff are mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a Child in Need, or Child Protection, plan).
- 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, unexplainable absences from education, and sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list but give an indication of the current themes in safeguarding and protecting children.

7.1 Child-on-Child Abuse

English Martyrs' RC Primary School recognises that children can abuse other children and that it can happen both inside and outside of school and online. This is referred to as child-on-child abuse and can take many forms.

English Martyrs' RC Primary School believes and understands the importance of challenging inappropriate behaviours between children that are abusive in nature. Staff understand that abuse is abuse, and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.

English Martyrs' RC Primary School recognises that child-on-child abuse can take many forms, including but not limited to:

- bullying, including cyberbullying
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- 'up-skirting', 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 to cause the victim humiliation, distress or alarm
- nude or semi-nude image sharing (also known as 'sexting' or youth produced/involved sexual imagery)
- initiation/hazing type violence and rituals

Staff and leadership recognise that that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all child-on-child abuse is unacceptable, and all reports will be taken seriously.

In order to minimise the risk of child-on-child abuse, we will:

- Provide an age/ability appropriate RSHE curriculum
- Provide a range of reporting mechanisms e.g. worry boxes, dedicated reporting emails monitored by DSLs, online report forms etc

English Martyrs' RC Primary School will not tolerate, dismiss or minimise any harmful behaviours in school and will take swift action to intervene when this occurs. All allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with associated school/college policies, including child protection, anti-bullying and behaviour. Alleged victims, perpetrators and any other child affected by child-on-child abuse may be supported by:

- taking reports seriously
- listening carefully
- avoiding victim blaming
- providing appropriate pastoral support
- working with parents/carers
- reviewing educational approaches, and in cases of sexual assault, informing the police and/or First Response

The school will take steps to ensure that appropriate curriculum time is dedicated to enabling children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of child-on-child abuse. We will also ensure that children recognise warning signs and what support is available, both within the school and externally (such as Kent Police, ChildLine etc.).

The Trust considers that all children should have a right to attend school and learn in a safe environment. Children should always be free from harm by adults and other children in and outside the school. The Trust recognises that some pupils will sometimes negatively affect the learning and well-being of others and their behaviour will be dealt with under the school's Behaviour Policy.

Safeguarding allegations

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found. The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this pupil
- indicates that young people outside the school may be affected by this pupil

Examples of safeguarding issues against a pupil could include:

Physical Abuse

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

Emotional Abuse

- Blackmail or extortion
- Threats and intimidation

Sexual Abuse

- Indecent exposure, indecent touching or serious sexual assaults

- Forcing others to watch pornography or take part in the sharing of nudes and semi-nudes

Sexual Exploitation

- Encouraging other children to attend inappropriate parties
- Photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older pupils may attempt to recruit younger pupils using any or all the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Creating a supportive environment in school and minimising the risk of safeguarding concerns towards pupils from other pupils

The Trust recognises 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. To achieve this, the school 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 helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That 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”
 - That if they 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
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

What to do

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed immediately.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact the local authority's designated officer (LADO) (or its equivalent if more than one local authority is implicated) to discuss the case and it may be that Children's Social Care are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome, and keep a copy in both pupils' files. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim). The DSL must also inform KCSP's Designated Lead Officer (identified at the beginning of this Policy) immediately. It may be appropriate to exclude the pupil being complained about for a period according to the school's Behaviour Policy and procedures.

Where neither the LADO or the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be undertaken along with an appropriate plan to ensure safety, considering as appropriate any pertinent individual differences of an alleged victim or alleged perpetrator. The plan should be monitored, and a date set for review with everyone concerned.

7.2 Child on Child Sexual Violence or Harassment

For the purposes of this policy, **sexual violence** between children refers to sexual offences under the Sexual Offences Act 2003 and includes: rape, assault by penetration, sexual assault. **Sexual harassment** between children refers to unwanted conduct of a sexual nature that can occur online and offline and can include: sexual comments, sexual "jokes" or taunting, physical behaviours (such as deliberately brushing against someone).

Sexual violence and sexual harassment can occur between two children of any age and sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable. KCSP Schools will challenge sexual harassment to ensure that these inappropriate behaviours are not normalised and provide an environment that may lead to sexual violence.

If any member of staff has any concern that a child is the victim or at risk of becoming a victim of sexual violence or sexual harassment between children, they **must** follow the guidance from the "Managing allegations against other pupils" **section above**.

Trust Schools must ensure that evidence-based content is delivered through the curriculum that is developed to be age and stage of development appropriate that tackles issues such as: healthy and respectful relationships; what respectful behaviour looks like; gender roles; stereotyping; prejudiced behaviour; and addressing cultures of sexual harassment. English Martyrs' RC Primary School will follow the guidance outlined in part five of KCSIE 2024. When responding to concerns relating to child-on-child sexual violence or harassment:

- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

Staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes. Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated as seriously and in line with relevant policies/procedures, for example anti bullying, behaviour, child protection, online safety.

It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

Immediate consideration will be given as how to best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, all other children, and staff and any actions that are required to protect them.

Where possible, KCSIE 2024 recommends that two members of staff manage reports of sexual violence and harassment.

Reports will initially be managed internally by the English Martyrs' RC Primary School and where necessary will be referred to Children's Services and/or the Police.

The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off, or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or English Martyrs' RC Primary School staff; and, any other related issues or wider context.

We will reassure and teach our pupils to understand that the law is in place to protect children and young people, rather than criminalise them.

English Martyrs' RC Primary School will regularly review decisions and actions to update and improve policies and practice.

The school will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours and may need signposting to further sources of support.

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

DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated March 2024)

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:

- Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this must be immediately reported to the DSL.
- Not delete the imagery or ask the young person to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

English Martyrs' RC Primary School recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or "sexting") is a safeguarding issue; this also includes AI produced sexual imagery. All concerns will be reported to and dealt with by the DSL (or deputy).

The DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate. Parents and carers will be informed at an early stage and involved in the process of supporting their children, unless there is good reason to believe that involving them would put a child at risk of harm.

A referral will be made to Children's Services and/or the police immediately if:

- the incident involves an adult (over 18).
- there is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, age or SEND).
- the image/videos involve sexual acts and a child under the age of 13,
- depict sexual acts which are unusual for the child's developmental stage,
- are violent, or
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time, if further information/concerns are disclosed. If DSLs are unsure how to proceed, advice will be sought from Children Services.

7.4 Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

When deciding whether to involve the police and/or children's social care, DSL's will need to consider whether a child is at risk of harm and a subsequent referral is appropriate.

Consideration should be given to whether or not there are any concerns about the young person's vulnerability including SEND, whether any pressure or coercion was applied, what ages are involved and to what extent were images shared. Further information and guidance should be sought from [UK Council for Internet Safety: Sharing nudes and semi nudes: advice for education settings working with children and young people.](#)

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

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

English Martyrs' RC Primary School recognises both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

English Martyrs' RC Primary School recognises that children can become trapped in CCE as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

English Martyrs' RC Primary School recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

Indicators of child exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;

- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of the internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being
- Go missing from school or home and are subsequently found in areas away from their own
- Have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of CCE and CSE, it must be remembered that not all children with these indicators will be exploited. CCE or CSE can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

CSE can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the Kent and Medway [Exploitation Identification Tool](#) and the MSCP Risk [Assessment tool for sexually active young people](#). More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

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

7.5 Serious Violence and 'County Lines' (a form of CCE)

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant

decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Further advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#). [County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) 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 Mechanism¹ 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.

English Martyrs' RC Primary School will make referrals to Children's Services and the police if we have reason to believe a student has become involved in these types of activity.

In addition, where an exploitation concern has been identified, the form linked below will also be completed, to provide intelligence to the police on local exploitation concerns and issues. The portal allows for the reporting of suspected perpetrators of child exploitation and Places and Spaces where Child Exploitation is suspected of taking place and vehicles believed to be connected to be exploiting children. [Report an Exploitation Concern Online](#).

This is for Child Exploitation specifically. General vulnerability concerns still need to be reported directly to the police (101 or 999).

Please note, this portal is not suitable for reporting crime, as is not constantly monitored

7.6 Mental Health

¹ National Crime Agency - Modern slavery and human-trafficking

English Martyrs' RC Primary School will ensure that all staff have an awareness of mental health problems and be aware that in some cases they can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these experiences can impact on children's mental health, behaviour, and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour indicating a mental health problem or being at risk of developing one.

If staff have a concern about a child's mental health, that is also a safeguarding concern, immediate action will be taken, following the reporting procedures in this policy.

7.7 Online Safety

It is recognised by English Martyrs' RC Primary School that the use of technology presents challenges and risks to children and adults both inside and outside of school.

The use of technology has become a significant component of many safeguarding issues. For example, technology often provides the platform that facilitates harm in cases of child exploitation; radicalisation; sexual predation and bullying.

English Martyrs' RC Primary School will empower, protect and educate the whole school community in the use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.

The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff. The DSL and leadership team and governance committee members have read, understood and acted upon all guidance regarding Online Safety within 'Keeping Children Safe in Education' 2024.

English Martyrs' RC Primary School identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into four 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.
- **Commerce** – being exposed to online gambling, inappropriate advertising, phishing and or financial scams.

English Martyrs' RC Primary School recognises the specific risks posed by mobile phones and cameras, and, in accordance with KCSIE 2024, has appropriate policies in place that are shared and understood by all members of the school community. Further information regarding the specific approaches relating to this can be found in the school's Online Safety Policy, Mobile Phone Policy and Acceptable Use Policy, all of which can be found on the school's website.

English Martyrs' RC Primary School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform and email systems.

- All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

All members of staff have access to appropriate, regular and up-to-date online safety information as part of their safeguarding training. English Martyrs' RC Primary School ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.

English Martyrs' RC Primary School ensures that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils/students and staff, including school devices used by pupils/students at home. **Our approach to online safety is in line with government guidance: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>.**

Filtering and monitoring is an important part of school's online safety responsibilities, but they are only one part of our approach to online safety. Pupils/students and adults may have access to systems external to the school control, such as mobile phones and other internet enabled devices and technology. Where concerns are identified, appropriate action will be taken.

English Martyrs' RC Primary School recognises that many pupils/students and parents will have unlimited and unrestricted access to the internet via mobile phones and other enabled devices, this is external to the school's control. Where concerns are identified appropriate action will be taken.

English Martyrs' RC Primary School will ensure a comprehensive whole school curriculum is developed and in place to enable and equip all pupils/students with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively. **DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE 'School' guidance.**

The school will also support parents and the wider school community (including all members of staff) to be aware and alert to the need to keep children safe online. We will share information with parents/carers about:

- what systems are in place to filter and monitor online use,
- what children do online as a part of their learning, including the sites they may be asked to access,
- who from the school or college (if anyone) their child is going to be interacting with online, as a part of remote learning.

The DSL will respond to online safety concerns in line with this and other associated policies such as anti-bullying and behaviour.

- Internal sanctions and/or support will be implemented as appropriate.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Where children are asked to learn online at home in response to a full or partial closure:

- English Martyrs' RC Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.

- All communication with learners and parents/carers will take place using English Martyrs' RC Primary School provided or approved communication channels; for example: Class Dojo, English Martyrs' RC Primary School provided email accounts and phone numbers and/or agreed systems e.g. Microsoft 365 or equivalent.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with this and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. English Martyrs' RC Primary School will be informed of who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

Additional guidance for DSLs and SLT regarding remote learning is available at DfE: [Safeguarding and Remote Education](#)

7.8 Children who are absent from education.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school and where there are unexplainable and/or persistent absences from education can be an indicator of abuse, neglect and exploitation and may also raise concerns about other safeguarding issues. We follow the government's statutory guidance '[Working together to improve school attendance](#)'. We monitor attendance carefully and address poor or irregular attendance without delay as set out in the attendance policy which can be found on the school website.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - Leave the school to be home educated
 - Move away from the school's location
 - Remain medically unfit beyond compulsory school age
 - Are in custody for four months or more (and will not return to school afterwards):
or
 - Are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

We will inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for more than 10 days.

Alternative provision settings

Where we place a pupil with an alternative provision provider, we understand that the school remains responsible for the safeguarding of pupils ensuring the placement meets the pupil's needs and obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

All staff should be aware that children who are **absent from education, particularly on repeat occasions and/or for prolonged periods and/or for unexplainable reasons**, can be a vital of a range of safeguarding issues, including neglect, child sexual exploitation and child criminal exploitation such as county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

- Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- English Martyrs' RC Primary School recognises that, when a child is not in school, they may be susceptible to, or exposed to, other risks, so we work with parents and other partners to keep children in school whenever possible.
- Where there are concerns that a child has unexplainable and/or persistent absences from education, the school will respond in line with its statutory duties (DfE [Children Missing Education](#) and local support available from the Medway attendance and children missing education teams

Attendance Team: aassa@medway.gov.uk

Children Missing Education: cme@medway.gov.uk

- Staff are aware of the school's Unauthorised Absence and Children Missing from Education Procedures (Attendance Policy available on website)

7.9 Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long-lasting, impact upon children and is a form of child abuse.

English Martyrs' RC Primary School recognises that domestic abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional abuse.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

English Martyrs' RC Primary School is an Operation Encompass School. This is a national police and education early intervention safeguarding partnership, to support children who witness and experience Domestic Abuse.

Operation Encompass means that the police will share information with our school/college/nursery/setting about all police attended Domestic Abuse incidents involving any of our children, where possible, PRIOR to the start of the next school day.

Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the First Response will be made if there are any concerns about a child's welfare.

Where the school is unsure of how to respond to a notification, advice may be sought from the First Response, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

7.10 So-called 'Honour-Based' Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed in the belief that they protect or defend the honour of the family and/or the community. These abuses may include female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

All staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should immediately follow the school's concern reporting procedures and speak to the Designated Safeguarding Lead (or deputy). As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's services. Where FGM has taken place, since 31 October 2015 there has been a **mandatory reporting duty** placed on **teachers** that requires a different approach (see following section).

7.11 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon **teachers**, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students.

The duty does not apply in relation to 'at risk of' or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty [FGM Fact Sheet](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should

still consider and discuss any such case with the school's or college's Designated Safeguarding Lead (or deputy) and involve children's social care as appropriate.

7.12 Forced Marriage

English Martyrs' RC Primary School recognise that since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if **no** violence, threats or another form of coercion are used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see page 155 of KCSIE 23) ([Legal age increases to 18](#))

Multi-agency statutory guidance for dealing with forced marriage, which can be found at [The right to choose: government guidance on forced marriage](#). Guidance for schools can be found in Section 8. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcd.gov.uk.

Staff at English Martyrs' RC Primary School will use the school's concern reporting system if they have any reason to believe that a child may be at risk of being taken out of the country for the purposes of a forced marriage.

7.13 Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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 is the process of a person legitimizing support for, or use of, terrorist violence.

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.

The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.

Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures

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

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

Every member of staff at English Martyrs' RC Primary School recognises that protecting children exposed to radicalisation and extremism is the same as safeguarding against any other vulnerability and should be approached in the same way. Where staff are concerned that children and young people are developing extremist views or show signs of being radicalised, they should discuss this with the Designated Safeguarding Lead who is able to support staff with any concerns they may have and may make a Prevent referral.

All staff and members of the governance committee should complete the [Prevent online Awareness training](#) package developed by the Home Office which includes guidance on how to identify people who may be susceptible to being drawn into terrorism, and how to refer them into the Channel process.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being involved with or supporting terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to being involved with or supporting terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

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

English Martyrs' RC Primary School acknowledges and understand the common reason for children becoming looked after is as a result of abuse and/or neglect and/or exploitation, and a previously looked after child potentially remains vulnerable.

The school has a '[designated teacher](#)' (Catherine Thacker, Headteacher) who works with local authorities to promote the educational achievement of registered pupils/students who are looked after or who have been previously looked after.

The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

7.15 Private Fostering

English Martyrs' RC Primary School understands their responsibility to inform the Local Authority via First Response, of private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement. (When a child under 16, or 18 if they are disabled, is cared for and lives with an adult who is not a close relative for 28 days or more.)

Parents and carers often fail to notify schools about private fostering arrangements even though they are legally required to notify the local authority. Often this is because they are unaware of the requirements, or they believe that this is a private family arrangement which does not concern anybody else. This lack of awareness means that many privately fostered children remain hidden and can be vulnerable.

What is private fostering?

Private fostering occurs when a child under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a close family relative for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins. Private fostering is a private arrangement made by the parent(s), (or those with parental responsibility) for someone to care for their child because they are unable to do so (permanently or temporarily). This may be due to parental ill health, a parent going abroad or into prison, a child being brought to the UK to study English or the relationship between the child and parent has broken down.

School staff play an essential role in identifying privately fostered children. If you know a child is being privately fostered, you should tell the parent/carer that they must report the arrangement to Medway Council at least six weeks before it happens or within 48 hours if the arrangement is current having been made in an emergency. School staff understand their responsibility to inform the Local Authority via First Response of Private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement.

Parents and carers can obtain a copy of the school Child Protection & Safeguarding Policy and other related policies on request or can view them via the school website.

7.16 Children who are lesbian, gay, bisexual, or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, other children can sometimes target them. English Martyrs' RC Primary School recognises children who are LGBTQ+ or are thought to be LGBTQ+ by other children, can be singled out by their peers or other individuals in the community.

When supporting a gender questioning pupil, we will take a cautious approach. We will also consider the broad range of their individual needs, in partnership with their parents/carers

(other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can trust and be open with. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Schools should refer to the DofE guidance for Schools and Colleges in relation to gender questioning children when deciding how to proceed.

7.17 Child Abduction and Community Safety Incidents

Child abduction is defined as the unauthorised removal or retention of a minor from a parent or carer. It can be committed by parents or other family members, people known but not related to the victim (e.g. neighbours, friends and acquaintances), and by strangers

Staff should also be aware of other community safety incidents in the vicinity of the school such as people loitering near the school and unknown adults talking to children.

The school will ensure that children get practical advice on keeping themselves safe, focusing on building their confidence and abilities rather than simply warning them about all strangers.

8. Safeguarding Children with Special Educational Needs, Disabilities and Health Conditions

English Martyrs' RC Primary School understands that children with special educational needs (SEN), disabilities and health needs face additional safeguarding challenges. These children may have an impaired capacity to understand, resist or avoid abuse. The DSL will work closely with the SENCO to plan learning opportunities and support, as required.

All staff will ensure that children with SEN, health conditions and disabilities are able to overcome the barriers that exist for this group of children, and specifically ensure that those with communication difficulties are supported to be able to express their voice and that it is listened to and acted upon.

It is important that all staff are aware that children with SEN, health conditions and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying and exploitation without explicitly showing signs.

All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities.

9. Child Protection Procedures

English Martyrs' RC Primary School adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website:

<https://www.medwayscp.org.uk/mscb/>

If staff have **any concerns** about a child's welfare, they should act on them immediately. See **page 2** for the flow chart setting out the concern reporting process for staff.

If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to **First Response 01634 334466** and/or the police. **If it is an emergency the police need to be called on 999.**

If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.

Less urgent concerns or requests for support will be referred to Children's Services and Family Solutions via the Medway online form ([the portal](#))

Once staff have reported their concerns, the DSL will make a decision about what action to take, these include:

- continuing to closely monitor the situation
- managing any support for the child internally, via the school's own pastoral support processes.
- a referral to Family Solutions for an Early Help Assessment
- a referral to Children's Services for statutory intervention.

All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record. Actions will be assigned to a specific member of the safeguarding team and will have a review date.

- All staff are aware of the process for contacting Children's Services for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wherever possible, the school will share safeguarding concerns, or the intention to refer a child to Children's Services, with parents or carers. **However, staff will not do so where it is felt that this could place the child at greater risk of harm or impede a criminal investigation.** On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.
- If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the **'No Name' consultation line at Medway First Response (9:30-12:30 term time) on 01634 33 1662.** If anyone other than the DSL makes a referral to external services, then they will inform the DSL, and Headteacher, as soon as possible.
- Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL, so they can reassure themselves the child is safe, and their welfare is being considered. If, in following this process, the staff member remains concerned, it is their responsibility to follow the school's escalation or whistleblowing process.
- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
- If, after a request for support, or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following [MSCP escalation procedures](#) to ensure their concerns have been addressed and, most

importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

- All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to First Response if the situation does not appear to be improving or is getting worse (in liaison with the early help practitioner).
- English Martyrs' RC Primary School is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation Encompass is, and there is a clear process for managing notifications in school (including cover if a named individual is absent).

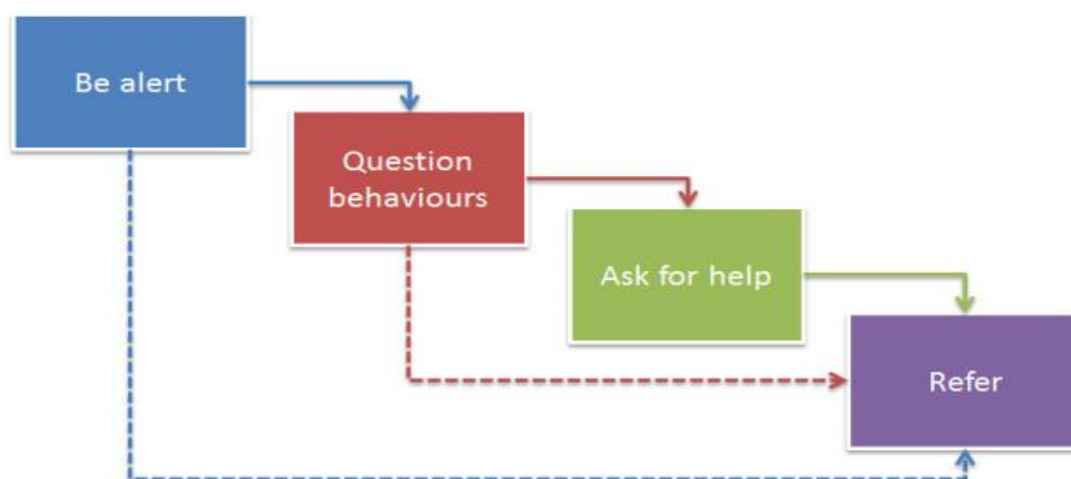
The child's wishes - systems are in place for children to express their views and give feedback. All systems and processes operate with the **best** interests of the child at their heart. **However, this should not prevent safeguarding action being taken, for the child or children involved.**

Where a child lives outside of Medway, the school will follow the procedures for that area's Multi-agency Partnership arrangements.

Additional guidance for staff includes:

- 'What to do if you are Worried About a Child Being Abused' (DfE 2015)
- Information Sharing advice for safeguarding practitioners (2018)
- Kent and Medway Inter-Agency Threshold Criteria for Children in Need
- The Assessment Framework for Children in Need and their Families (2000)

'What to do if you are worried about a child being abused' (DfE 2015) identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect. All staff members are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

10. Children Who May Benefit from Early Help

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

Any child may benefit from early help at some point, but all staff should be alert to the potential need for early help for those who:

- Have a disability, a specific additional need or particular health condition.
- Has an SEN, whether or not they have an EHCP.
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour.
- Is frequently missing from education, home, or care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from education – including those who attend a Pupil Referral Unit or Alternative Provision.
- Is at risk of radicalisation.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Has a parent or carer in custody or is affected by parental offending.
- Has challenging family circumstances, such as parental substance misuse, adult mental health issues and domestic abuse
- Is at risk of so-called 'honour-based abuse, such as FGM or Forced Marriage
- Is a privately fostered child.

Where it is identified that a child may need early help support, staff and the DSL will respond in line with Section 8 of this policy.

11. Record Keeping

Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in the child's safeguarding record.

Safeguarding records will usually record facts and not personal opinions. If a staff member records an opinion, such as this should be made explicit in the recording.

A body map will be completed if injuries or marks are observed, with an accompanying detailed and objective written description.

Staff should NOT take photographs of injuries; staff should use body maps and written descriptions to detail concerns. Taking photos of injuries can be traumatic and distressing for children and staff. Staff should not examine a child and should only record what they can see.

If, in exceptional circumstances, photos of injuries are required for evidence purposes, this should be carried out by specialist police officers. If for some reason, you are directed to take photos of an injury by a social worker or police officer, only do so on receipt of an email confirming the name of the person requesting, their role, the date, time, and the rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a social worker/ Police officer to attend.

Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff making the report. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

Staff, volunteers and clergy must record any welfare concern that they have about a child or young person on the CPOMS (Child Protection Online Management of Safeguarding) online system. Where clergy or volunteers do not have access to the CPOMS system, concerns can be recorded on a record of concern template, one of which is located in each classroom. For concerns not logged on CPOMS, the DSL should be informed that a concern has been raised. Records must be completed as soon as possible after the incident/event and must be signed and dated. Any verbal conversations should be promptly recorded in writing.

The DSL will keep written records of all concerns, discussions and decisions, including the rationale for those decisions; this should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are highly confidential and shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL, within 5 days of the child starting at their new school and a receipt of delivery will be obtained.

Detailed guidance on Record Keeping is found in a separate document "**Guidelines for Recording Keeping**" – Staff, volunteers and clergy MUST familiarise themselves with the responsibilities outlined in this document.

The Trust recruitment policy, Trust Records Management Policy and Trust Single Central Record and Safer Recruitment Procedures set out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 6 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

12. Child protection files

Where children leave the school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be done separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs, or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and to have that support in place for when the child arrives.

If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person, to ensure there is effective transition and handover of information.

Child protection files should always be kept by the education setting where the child is on roll. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc. Records for children who leave English Martyrs RC Primary School with no onward UK placement are kept in locked secure storage for a minimum of five years.

13. Multi-agency Working

The Trust recognises and is committed to their responsibility to work with other professionals and agencies both to ensure children and young people's needs are met and to protect them from harm. The Trust endeavours to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

The Trust is not the investigating agency when there are child protection concerns and the Trust will therefore pass all relevant cases to the statutory agencies. They will however contribute to the investigation and assessment processes as required and recognise a crucial part of this may be in supporting the child while these take place.

English Martyrs' RC Primary School identifies that they have a pivotal role in multi-agency safeguarding arrangements. The Trust ensures that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2023.

English Martyrs' RC Primary School recognises and is committed to its responsibility to work within the MSCP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative relationships with professionals in other agencies, in line with statutory guidance.

English Martyrs' RC Primary School will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.

English Martyrs' RC Primary School recognises the importance of multi-agency working and will provide requested reports and support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or early help multi-agency meetings.

14. Confidentiality and Information Sharing

The Trust recognises that all matters relating to child protection are confidential. English Martyrs' RC Primary School expect all staff to treat information they receive about children and young people in a highly discreet and confidential manner. Confidential information should **never** be discussed casually in conversation or shared with any person other than on a 'need-to-know basis'

All members of staff must be aware that whilst they have duties to keep information confidential, they also have a professional responsibility to be proactive and share information as early as possible, to help identify, assess and respond to risks or concerns about safety and welfare. This will only involve those who need to be involved, such as the DSL and Medway Children's Services.

KCSIE, the [Information Commissioner's Office \(ICO\)](#), DfE [Data Protection in schools guidance](#) and DfE ['Information sharing advice for safeguarding practitioners'](#) guidance provides further details regarding information sharing principles and expectations.

English Martyrs' RC Primary School recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2024.

The Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection, yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. DfE ["Information sharing advice for safeguarding practitioners"](#) (2018) provides further detail.

English Martyrs' RC Primary School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. Our DPO is Charlotte Robinson, who is contactable via dpo@kcsp.org.uk. Further information can be found in our Data Protection Policy which can be found on our website.

All staff are aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

Where the serious harm test under the legislation is met, staff must not provide pupils' personal data. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, the school must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek advice from the Trust Safeguarding Lead Officer.

Where a child leaves the School, the DSL should ensure that their child protection file is transferred to the new school as soon as possible, securely, and confirmation of receipt should be obtained. This should be transferred separately from the main pupil file.

15. Complaints

The Trust has a Complaints Policy available to parents/carers, pupils/students, staff, volunteers and clergy who wish to report concerns. This can be found on the school and

Trust websites. It is also available on request from the office. As a school we encourage children and families to raise complaints, concerns or comments with us. We have a robust internal investigation process.

Safeguarding concerns should be raised with school immediately. If a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the police on 101. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with [section 19 of this policy](#).

16. Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of “*Keeping Children Safe in Education*” (2024) which covers Safeguarding information for all staff.
- School leaders and all members of staff who work directly with children will read Annex B within Keeping Children Safe in Education 2024.
- School leaders and governors including the DSL will have a thorough awareness of the entirety of KCSIE.
- All members of staff sign to confirm that they have read and understood Part One and Annex B (or Annex A if deemed appropriate) of KCSIE and this will be recorded on the single central record.
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the English Martyrs’ RC Primary School internal safeguarding processes as part of their induction through training, leaflets and policies.
- All staff undergo safeguarding and child protection training (including online safety) at induction. The training is regularly updated. Induction and training is in line with advice from the Medway Safeguarding Children Partnership.
- In addition to safeguarding training, all members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary/supply staff) will be made aware of the school’s expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy.

Training (including induction training) – is mandatory. Confirmation must be recorded and must include:

- this child protection and safeguarding policy
- school behaviour policy
- physical intervention or positive handling policy
- online safety
- Staff code of conduct
- the safeguarding response to children who absent from school; and
- Part One of KCSIE 2022 and Annex B for school leaders and all members of staff who work directly with child
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies) see KCSIE 2022
- training on the government’s anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being involved with or supporting terrorism and to challenge extremist ideas.

Training for teachers will have regard to the Teachers' Standards to support the expectation that all teachers:

- manage behaviour effectively to ensure a good and safe environment
- have a clear understanding of the needs of all pupils

This will include internal responsibilities within a school, child protection processes, how to recognise and respond to signs and symptoms of concern and abuse and safe working practice. Training is organised by the Headteacher and DSL in line with Trust, government, local and diocesan guidance that currently requires this to be updated annually.

Online Safeguarding training is available via The Key and can be arranged by the DSL. Contact sflight@kcsp.org.uk for details.

The Trust Lead Safeguarding Officer, Education Directors, Area School Improvement Partners, Headteachers and DSLs (including Deputies) will:

- undertake the required DSL safeguarding training when they first take up the role and continue to update their knowledge on an on-going basis and at least every 2 years as required by guidance.
- update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- undertake Prevent awareness training.

The Trust Safeguarding Director and Governance Committee Safeguarding Lead will:

receive safeguarding training upon commencement of their role and then on an annual basis. The Training is available via The Key and must be accessed by individuals themselves, please contact sflight@kcsp.org.uk for details.

Trust Directors and Governance Committee members

All Trust Directors and Governance committee members will receive annual training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. Online training is available via The Key and must be accessed by individuals themselves, please contact cpd@kcsp.org.uk for details.

The Governance Committee recognises the expertise staff build through undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

The DSL and Headteacher provide an annual report to the Governance Committee detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.

English Martyrs' RC Primary School has a nominated Safeguarding lead for the Governance Committee, Kate Taylor, who ensures that all members of the Governing Body access appropriate safeguarding training covering their specific strategic responsibilities, at induction and on a regular basis. Training will provide them with the knowledge to ensure their school's safeguarding policies and procedures are effective. This includes governors' strategic responsibility for online safety.

17.Safe Working Practice

Staff are required to work within clear guidelines on safe working practice as set out in the Trust's Staff Code of Conduct. The DSL will ensure that all staff and volunteers have read this policy and staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.

Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff, volunteers and clergy should be aware of the school's Behaviour and Physical Intervention Policies and any physical interventions must be in line with agreed policy, procedure and national guidance. Appropriate training should be provided. A list of staff who have accessed physical intervention training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in line with guidance.

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour Policy.

If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with, for how long. Doors, ideally, should have a clear glass panel in them and be left open.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [Guidance for safer working practice for those working with children and young people in education settings May 2019](#) (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the Trust Code of Conduct, the school's Online Safety Policy and Acceptable Use Policy.

18.Staff Supervision and Support

Any member of staff, volunteer and the clergy affected by issues arising from concerns for children's welfare or safety can seek support from the DSL, Headteacher or, if necessary, the Trust Lead Safeguarding Officer who will seek advice as appropriate.

The induction process will include familiarisation with safeguarding and child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare. All newly qualified teachers, classroom assistants and volunteers receive induction training and have a mentor or co-ordinator with whom they can discuss concerns including the area of child protection.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- All staff will be supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with outside agencies for professional support if required. Staff can also approach organisations such as their Union, the Education Support Partnership or other support bodies directly.

All Lead DSLs in Trust schools take part in Supervision run by Educational Psychologists.

19. Safer Recruitment

The Trust is committed to ensure that all steps are taken to recruit staff, volunteers and clergy who are safe to work with our pupils/students and have their welfare and protection as the highest priority. The Trust and the School Leadership Team are responsible for ensuring that the school follows safer recruitment processes outlined within guidance, including accurate maintenance of the Single Central Record; and an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role.

The Trust Recruitment Policy and Trust Single Central Record and Safer Recruitment Procedures provide further detail on safer recruitment requirements.

English Martyrs' RC Primary School values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils/students and staff.

English Martyrs' RC Primary School will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the school in deciding about the suitability of the prospective employee.

The school will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online which may be relevant to their suitability to work with children and/or may have an impact on the school/academy's reputation.

The Headteacher will ensure that any senior staff responsible for recruitment complete accredited Safer Recruitment Training in line with government requirements. The Trust Safeguarding Lead Officer will ensure that Headteachers and relevant senior members of the Trust central team who are responsible for recruitment complete accredited Safer Recruitment training in line with government requirements. At all times, the Headteacher and Governance Committee Members will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education,'* DfE (2024). Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#)).

The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

Where appropriate we are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child. The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

20. Allegations Against Members of Staff, including Supply Staff, Contractors and Volunteers

English Martyrs' RC Primary School recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

All staff, contractors and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team. English Martyrs' RC Primary School understands the duty to refer to the LADO where it is alleged that anyone working in the school has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

For specific guidance on how to respond to concerns or allegations against staff (including those not directly employed by the Trust) or volunteers, please refer to the [Appendix 6](#) which sets out the Trust's **Procedures for Managing Safeguarding Concerns and Allegations made about staff, including supply teachers, other staff, volunteers and contractors**. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. The leadership team at English Martyrs' RC Primary School will take all concerns or allegations received seriously.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:

- Allegations should be referred immediately to the Headteacher (or Deputy in their absence) who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway [LADO Leaflet](#) if you need further information. They will also notify the Trust Safeguarding Lead Officer.

If there are any concerns about the Headteacher or members of the Trust Executive team these should be referred immediately to the Trust Chief Executive Officer who will contact the Local Authority Designated Officer (LADO).

Where there are concerns about the Chief Executive Officer, members of the Trust Board of Directors or School Governance Committee Members, these should be referred immediately to the Trust Company Secretary who will contact the Local Authority Designated Officer (LADO) without delay.

In all cases, advice will be sought from the LADO within 24 hours of the alleged incident. No member of staff will undertake further investigations before receiving advice from the LADO. Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Trust Safeguarding Lead Officer should contact **the LADO directly on 01634 331065**.

Where Headteachers are unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

There is a legal duty to refer to the [Disclosure and Barring](#) Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

In addition to necessary notification to the local authority in line with the above procedures, where an allegation is made against a member of the clergy or a member of a religious order, linked to an educational establishment, the case manager (as identified in Appendix 2) will also notify the Diocesan Safeguarding Officer who will take a lead role for the Diocese in any investigation.

Where there is a belief that there is, or maybe, a conflict of interest in reporting a concern or an allegation about a member of staff (including a supply teacher, volunteer or contractor) to the member of Trust staff outlined above, report it directly to the Local Authority Designated Officer (LADO).

Appendix 6 also sets out the Trust's procedures for dealing with low-level concerns.

21. Concerns that do not meet the 'harms threshold'

English Martyrs' RC Primary School's Staff Code of Conduct explains what a low-level concern is and the importance of sharing concerns. We have clear reporting procedures for children, parents and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures are in place for confidentially sharing, recording and handling of low-level concerns.

A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') that a member of staff has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).

Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse. Low-level concerns should be reported to the Headteacher. Any low-level concerns about the Headteacher or members of the Trust central team should be reported to the Trust CEO. Where low-level concerns are reported, the Headteacher or Trust CEO should liaise with the LADO Service on 01634 331 065

The Medway LADO policy states that all allegations, including low level are considered with the LADO, please communicate and engage with the LADO in relation to all low-level concerns.

22. Whistleblowing Procedure

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team.

All staff and volunteers need to be aware of the Trust's Whistleblowing Policy and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

23. Curriculum and Staying Safe

Schools play a pivotal and crucial role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; "what is 'safe'"; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Our curriculum provides opportunities for increasing self-esteem, self-awareness, social and emotional understanding, assertiveness and decision making; this ensures that our pupils/students have a range of strategies to ensure their protection and that they can also protect others.

Online safety is integrated into the curriculum.

We recognise the crucial role that school plays in preventative education. We have a whole school approach that creates a culture of zero tolerance for racism, ableism, sexism, misogyny, homophobia and sexual violence/harassment.

The school ensures that those delivering the PSHE curriculum have been trained and equipped to deliver high quality PSHE education in a safe way. For further information and training on Medway PSHE programs please follow the link: [School PSHE programmes](#).

Other systems and interventions that exist outside of day-to-day teaching opportunities, classroom interaction and support include: anti-bullying mentors, worry boxes, circle time, assemblies, pupil voice opportunities etc. Systems have been established to support the empowerment of children and young people to talk to a range of staff, volunteers and clergy. Pupils will be listened to and heard, and their concerns will be taken seriously and acted upon promptly and appropriately.

24. The Use of School Premises by Other Organisations

Services or activities provided separately by another organisation from time to time may seek to use the school premises. The Headteacher or Governance Committee will seek written assurance that the organisations concerned have suitable policies and procedures in place regarding safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers.

The DSL will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The Trust Model Lettings Policy and Agreement must be in place prior to the commencement of any lettings arrangement. Without this assurance, an application to use the premises will be refused.

If the school or Trust receives an allegation relating to an incident that happened when an individual or organisation was on school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO as we would with any safeguarding allegation.

25. Checking the identity and suitability of visitors, including visiting speakers

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge. Further information can be found in the Trust's Protocols for visiting speakers that can be found on the Trust website.

All visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and the Trust's procedures will be followed which include a risk assessment and visitor confirmation form prior to any event taking place – this can be found on the Trust's website. This is to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

26. Security

English Martyrs' RC Primary School has a responsibility to provide a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore, all staff and people on the site have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass. Our school has a clear system of ensuring visitors are accompanied/supervised by a staff member.

All visitors/external students who do not have appropriate enhanced DBS clearance will be accompanied/supervised by a staff member at all times. Any individual on site who is not known, or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

English Martyrs' RC Primary School will not tolerate or accept the behaviour of any individual (including parents) that threatens school security or leads others (child or adult) to

feel unsafe. This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

All schools have plans in place to respond effectively to different types of incidents. If an incident does arise, staff should be able to draw on their knowledge from existing plans and make good, informed judgements about how to keep themselves and others safe.

27. Monitoring and Review

All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy and sign to the effect that they have read and understood its contents. The policy will also be available to parents/guardians on the school website or on request from the office. This policy has been written in November 2024 to reflect the updated guidance and legislation issued in relation to safeguarding children and promoting their welfare. The DSL will review the policy following any serious child protection concerns (including following learning identified from serious case reviews) or substantiated allegations against staff, to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice. This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

All policies related to safeguarding will be reviewed, in line with Trust model policies, by the Governance committee which has responsibility for oversight of school safeguarding and child protection systems. The Headteacher will ensure regular reporting by the Designated Safeguarding Lead on safeguarding activity and systems in the school to the Governance committee. The Governance committee will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Trust Safeguarding Officer and Governance committee with consequent action.

In addition, the school's Designated Safeguarding Lead, in conjunction with the Governance Committee Safeguarding Lead, will monitor the operation of this policy and its procedures and will make termly briefings and an annual report to the Governance committee. Termly governance reports and copies of the annual report will be copied to the Safeguarding Lead Director. The template for annual reporting can be requested from office@kcsp.org.uk

Appendix 1: Definitions of Forms of Abuse/Specific Safeguarding Issues

Definitions of Forms of Abuse

All Trust 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. For further guidance: [Responding to Abuse and Neglect](#) This is outlined locally with the Medway Threshold Guidance

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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. Please click on the hyperlink for further information, advice and guidance: [NSPCC Physical Abuse](#)

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. Please click on the hyperlink for further information, advice and guidance: [NSPCC Emotional Abuse](#)

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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. Please click on the hyperlink for further information, advice and guidance: [NSPCC Sexual Abuse](#)

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Please click on the hyperlink for further information, advice and guidance: [NSPCC Neglect](#)

Exploitation: a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Appendix 2: Support Links

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Pupils/Students

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Kidscape: www.kidscape.org.uk
- Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

Support for adults

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

Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 2024

Mental Health

- The department 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 links to all materials and lesson plans.

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Every mind matters <https://www.nhs.uk/oneyou/>

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the Link Programme. Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- NSPCC – Safeguarding children with special educational needs and disabilities (SEND) and NSPCC – Safeguarding child protection/deaf and disabled [children and young people](http://www.nspcc.org.uk/children-and-young-people)

Domestic Abuse

- Refuge: www.refuge.org.uk
- Domestic abuse services: www.domesticabuseservices.org.uk
- Women’s Aid: www.womensaid.org.uk
- Men’s Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Honour based Violence (FGM and Breast Ironing)

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- Information and resources <https://www.gov.uk/government/collections/female-genital-mutilation>
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- National FGM Centre <http://nationalfgmcentre.org.uk/fgm/>

Contextual Safeguarding, Child-on-Child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- [Supporting practice in tackling child sexual abuse - CSA Centre](http://www.supportingpracticein tackling child sexual abuse - CSA Centre)
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk

- Internet Watch Foundation (IWF): www.iwf.org.uk

Substance Misuse

- Drugs advice for Schools: [Gov.uk Drugs advice for schools](http://www.gov.uk/drugs-advice-for-schools)
- Talk to Frank <https://www.talktofrank.com/>
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk
- Prevent: www.gov.uk/government/publications/prevent-duty-guidance

Appendix 3: Related Safeguarding Policies

This policy is one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies as listed below: (to be read and followed alongside this document).

- Acceptable Use of Technology Policies (AUP)
- Anti-Bullying
- Attendance
- Behaviour including use of physical intervention
- Complaints
- Confidentiality
- Data protection and Information sharing
- Emergency Procedures (Incl. evacuation & lock-down)
- First aid and accidents – including safer eating/allergies/infection/asthma
- Health and safety
- Managing allegations against staff
- Online Safety; Social media and Mobile technology
- Personal and intimate care
- Relationship Health and Sex Education (RHSE)
- Risk assessments (e.g. school trips, use of technology, school re-opening)
- Safer recruitment
- Searching, screening and confiscation
- Staff Code of Conduct/Behaviour policy
- Whistleblowing

The school may wish to hyperlink documents to ensure staff have easy access to the additional policies that should be read alongside this document.

Appendix 4: Procedure for dealing with disclosures (the 6 R's – what to do if)

1. Receive:

- Listen to what is being said without displaying shock or disbelief, if you display denial to a child or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

2. Reassure:

- Reassure the child, but only so far as is honest and reliable. Do not make promises that you cannot be sure to keep, e.g. "everything will be all right now".
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

3. React:

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell explain describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you must do next and who you must talk to

4. Record:

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used by the child
- Record statements and observable things, not your interpretations or assumptions – keep it factual.

5. Remember:

- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

6. Relax

- Get some support for yourself

Appendix 5: Specific Safeguarding Issues

English Martyrs' RC Primary School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced sexual imagery or "Sexting"
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
- Up-skirting

(Also see Part One and Annex B within 'Keeping children Safe in Education' 2024)

Appendix 6: Procedures for managing safeguarding concerns and allegations about staff, including supply teachers, volunteers and contractors

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, supply teacher, volunteer or contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegations of abuse very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

A 'case manager' will be identified at the earliest opportunity to lead any investigation. The 'case manager' will normally be:

- The Headteacher for investigations of allegations about members of school staff, volunteers or contractors
- The Chief Executive Officer of the Trust for investigations of allegations about the Headteacher and Trust office team staff members
- The Company Secretary for investigations of allegations about members of the Trust Board and governance committee members
- The Chair of the Trust Board for allegations about the Chief Executive Officer
- Governance committee members must refer any allegation immediately to the Trust Safeguarding Officer. Governance committee members must not investigate any allegation.

If appropriate, the case manager may nominate an individual, such as a suitable external independent investigator or another member of staff, to investigate/review the allegation on their behalf.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is a reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will

only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school/Trust so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school/Trust so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school within the Trust.

If in doubt, the case manager will seek views from the Trust's CEO (and Trust Safeguarding Lead) and the local authority designated officer (LADO), as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedures for dealing with allegations

In the event of an allegation that meets the criteria above, the 'case manager' will take the following steps:

- Discuss the allegation with the local authority designated officer (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the Police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the Police). Please refer to the Medway [LADO Leaflet](#) if you need further information.
- Inform the Trust Safeguarding Lead Officer.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the Police or children's social care services, where necessary). Where the Police and/or children's social care services are involved, the case manager will only share information with the individual that has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with the children at the school is justified or whether alternative arrangements such as those outlined above can be put in place.

Advice will be sought from the LADO, Police and/or children's social care services, the Trust Lead Safeguarding Officer, as appropriate.

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If immediate suspension is considered necessary**, the case manager will agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school/Trust and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in the school/Trust and/or liaise with the Police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. All staff have access to the Employee Assistance Programme through the Education Support Partnership.
- Inform the parents/carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or Police, if applicable). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents/carers of the child/children involved informed of the progress of the case and will seek advice from the LADO regarding what information can be disclosed to the parents/carers (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- **If an allegation is made against a member of the clergy** or a member of a religious order, linked to an educational establishment, the Diocesan Safeguarding Officer must also be notified who will take a lead role for the Diocese in any investigation.

In our primary schools, we will inform Ofsted of any allegations of serious harm or abuse by a person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the Trust or a school is made aware that the Secretary of State for Education has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the Police are involved, wherever possible, the Trust will ask the Police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Trust's disciplinary process, should this be required at a later point.

Additional considerations for handling allegations or concerns about supply staff and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a supply teacher or contracted member of staff provided by an agency, we will take the actions below in addition to our standard procedures:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The case manager will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school or Trust, while the investigation is carried out
- We will involve the agency fully, but the school/Trust will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer (LADO) whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school/Trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the Trust will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

The case manager must also discuss this with the Trust Lead Safeguarding Officer.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school/Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will get advice from the LADO, Police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents/carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

Record Keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be false or malicious will be deleted from the individual's personnel file (unless the individual consents for the record to be retained on file).

For all other allegations (which are not found to have been malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- Notes of any action taken and decisions reached and the outcome A declaration on whether the information will be referred to in any future reference.

In these cases, a copy will be provided to the individual, in agreement with children's social care or the police as appropriate.

We will retain all other records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- not refer to any allegation that has been found to be false, unsubstantiated, unfounded or malicious, or any repeated allegations which have all been found to be false, unsubstantiated, unfounded or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstance of the case with the LADO to determine whether there are any improvements that we can make to the Trust's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

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

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school

- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 12 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

- Low-level concerns should be reported to the Headteacher. Any low-level concerns about the Headteachers or members of the Trust office team should be reported to the Trust CEO. The Medway LADO policy states that all allegations, including low level are considered with the LADO, please communicate and engage with the LADO in relation to all low-level concerns.

If the concern is raised via a third party, the Headteacher, CEO or Trust Board Chair (if the low level concern relates to the CEO) will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The information collected will be used to categorise the type of behaviour and determine any further action, in line with the Trust's Code of Conduct. The Headteacher, CEO or Trust Board Chair (if the low level concern relates to the CEO) will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded confidentially on file. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Low-level concerns about supply staff and contractors

Low level concerns which are shared about supply staff and contractors will be notified to their employers. The Headteacher will consult with the LADO if unsure whether low-level concerns shared about a member of staff meet with harm threshold.