

# The Charles Dickens School Child Protection and Safeguarding Policy

## September 2024

*This Policy is based on the exemplar Child Protection and Safeguarding Policy from The Education People Education Safeguarding Service, which is based on Keeping Children Safe in Education DfE guidance September 2024*

**This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.**

Date written: September 2024

Date agreed and ratified by Governing Body: September 2024

Date of next review: August 2025

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

### Key Contacts

<b>Designated Safeguarding Lead (DSL)</b>	Louise Kettle	Deputy Head Teacher	<a href="mailto:lkettle@cds.kent.sch.uk">lkettle@cds.kent.sch.uk</a>
<b>Deputy Designated Safeguarding Leads</b>	Warren Smith Louisa Aubry Sophie Tyler Lauren Roden Rolf Henderson (from 24/9) Daniel Shepperson	Headteacher Safeguard Manager Safeguard Manager AHT DHT  Associate AHT	<a href="mailto:wsmith@cds.kent.sch.uk">wsmith@cds.kent.sch.uk</a> <a href="mailto:laubry@cds.kent.sch.uk">laubry@cds.kent.sch.uk</a> <a href="mailto:styler@cds.kent.sch.uk">styler@cds.kent.sch.uk</a> <a href="mailto:lroden@cds.kent.sch.uk">lroden@cds.kent.sch.uk</a> <a href="mailto:rhenderson@cds.kent.sch.uk">rhenderson@cds.kent.sch.uk</a>  <a href="mailto:dshepperson@cds.kent.sch.uk">dshepperson@cds.kent.sch.uk</a>
<b>CEO/Executive Headteacher BCAT</b>	Kirstin Cardus	CEO/Executvie Headteacher	<a href="mailto:kcardus@bartoncourt.org">kcardus@bartoncourt.org</a>
<b>Safeguarding Governor</b>	Stephen Beale	Chair of Governors	<a href="mailto:gov-sbeale@bartoncourt.org">gov-sbeale@bartoncourt.org</a>
<b>Safeguarding Trustee</b>	Mr Alex Ttaris	Trustee	<a href="mailto:dir-attaris@bartoncuort.org">dir-attaris@bartoncuort.org</a>

## Contents

What to do if you have a welfare concern in The Charles Dickens School .....	4
1. Child Focused Approach to Safeguarding.....	5
<b>1.1 Introduction</b> .....	5
<b>1.2 Policy Context</b> .....	6
<b>1.3 Definition of Safeguarding</b> .....	6
<b>1.4 Related Safeguarding Policies</b> .....	8
<b>1.5 Policy Compliance, Monitoring and Review</b> .....	8
2 Key Responsibilities .....	9
<b>2.1 Governance and Leadership</b> .....	9
<b>2.2 Designated Safeguarding Lead (DSL)</b> .....	11
<b>2.3 Members of Staff</b> .....	13
<b>2.4 Children and Young People</b> .....	14
<b>2.5 Parents and Carers</b> .....	14
3 Child Protection Procedures .....	14
<b>3.1 Recognising Indicators of Abuse and Neglect</b> .....	14
<b>3.2 Responding to Child Protection Concerns</b> .....	16
<b>3.3 Recording Concerns</b> .....	18
<b>3.4 Multi-Agency Working</b> .....	19
<b>3.5 Confidentiality and Information Sharing</b> .....	20
<b>3.6 Complaints</b> .....	21
4 Specific Safeguarding Issues .....	21
<b>4.1 Child-on-child Abuse</b> .....	21
<b>4.2 Child on Child Sexual Violence or Harassment</b> .....	24
<b>4.3 Nude and/or Semi-Nude Image Sharing by Children</b> .....	25
<b>4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)</b> .....	27
<b>4.5 Serious Violence</b> .....	28
<b>4.6 Modern Slavery</b> .....	28
<b>4.7 So-called Honour Based Abuse (HBA)</b> .....	28
<b>4.8 Preventing radicalisation</b> .....	29
<b>4.9 Cybercrime</b> .....	30
<b>4.10 Domestic abuse</b> .....	31
<b>4.11 Mental health</b> .....	32
5 Supporting Children Potentially at Greater Risk of Harm .....	32
<b>5.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)</b> .....	32
<b>5.2 Children Requiring Mental Health Support</b> .....	33
<b>5.3 Children who are absent from education</b> .....	33
<b>5.4 Elective Home Education</b> .....	34
<b>5.5 Children who need a Social Worker (Child in Need and Child Protection Plans)</b> .....	35
<b>5.6 Looked after children, previously looked after children and care leavers</b> .....	35

5.7	<b>Children who are Lesbian, Gay, Bi, or Trans (LGBT)</b>	35
5.8	<b>Children who are privately fostered</b>	36
6	<b>Online Safety</b>	36
6.1	<b>Policies and Procedures</b>	39
6.2	<b>Appropriate Filtering and Monitoring</b>	39
6.3	<b>Information Security and Access Management</b>	43
6.4	<b>Remote/Online learning</b>	43
6.5	<b>Online Safety Training for Staff</b>	43
6.6	<b>Educating Pupils</b>	44
6.7	<b>Working with Parents/Carers</b>	44
7	<b>Staff Engagement and Expectations</b>	44
7.1	<b>Staff Awareness, Induction and Training</b>	44
7.2	<b>Safer Working Practice</b>	45
7.3	<b>Supervision and Support</b>	46
8	<b>Safer Recruitment and Allegations Against Staff</b>	46
8.1	<b>Safer Recruitment and Safeguarding Checks</b>	46
8.2	<b>Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors</b>	47
9	<b>Opportunities to Teach Safeguarding</b>	49
10	<b>Physical Safety</b>	49
10.1	<b>Use of ‘reasonable force’</b>	49
10.2	<b>The Use of Premises by Other Organisations</b>	49
10.3	<b>Site Security</b>	50
11	<b>Local Support</b>	50
	<b>Appendix 1: Categories of Abuse</b>	52
	<b>Appendix 2: Support Organisations</b>	54

# What to do if you have a welfare concern in The Charles Dickens School

## Why are you concerned?

- For example
- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks/bruises as well as dress
- Behaviour change
- Witnessed concerning behaviour

## Act Immediately and record your concerns (if urgent, speak to a DSL first)

- Follow the School's procedure – complete a green welfare concern form.
  - Reassure the child
  - Clarify concerns using open questions if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
  - Record opinions and not facts and use child's own words. Sign and date your record
  - Seek support for yourself as required from DSL

**Inform the Designated Safeguarding Lead** – Louise Kettle (Deputy Headteacher), or if unavailable, one of the Deputy DSLs: WSM, KCA, LRO, LAU, STY, DSH, RHE (From 24/9/24)

## Designated Safeguarding Lead

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent Request for Support to the Front Door Service via the portal or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with Kent Safeguarding Support Level Guidance and KSCMP procedures, as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the Front Door Service Portal.
- Where the school/college is unsure, advice can be sought from a Local Authority Social Worker at the Front Door Service via 03000 411 111
- Where support is required out of working hours, contact the Out of Hours Service via 03000 41 91 91.

## If you are unhappy with the response

### Staff:

- Follow Kent safeguarding partnership escalation [Home - Kent Safeguarding Children Multi-Agency Partnership \(kscmp.org.uk\)](#)
- Follow Whistleblowing procedures

### Pupils and Parents:

- Follow school complaints procedures details of which can be found on the school website: Complaints policy link

**Record decision making and action taken in the pupil/pupil child protection**

## Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

**Review and request further support (if necessary)**

At all stages the child's circumstances will be kept under review  
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**

# 1. Child Focused Approach to Safeguarding

## 1.1 Introduction

- The Charles Dickens School recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and pupils/pupils) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- The Charles Dickens School believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at The Charles Dickens School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend The Charles Dickens School but may also apply to other children connected to the school, for example, siblings, or younger members of staff (under 18s) or children on pupil/work placements.
- The Charles Dickens School recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- The Charles Dickens School recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
  - **Prevention**
    - positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - **Protection**
    - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - **Support**
    - adopt a child centred approach and provide support for all pupils, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
  - **Collaboration:**
    - with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2024.

## 1.2 Policy Context

- This policy is implemented in accordance with our compliance with the current 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.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:
  - Keeping Children Safe in Education (KCSIE)
  - Working Together to Safeguard Children (WTSC)
  - Ofsted: Education Inspection Framework
  - Framework for the Assessment of Children in Need and their Families, 2000
  - Kent and Medway Safeguarding Children Procedures
  - The Education Act 2002
  - Education and Inspections Act 2006 Not relevant to all settings - remove if not applicable
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - The Human Rights Act 1998
  - The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are pupils under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- The Charles Dickens School will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.
- The Charles Dickens School recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

## 1.3 Definition of Safeguarding

- In line with 'Working Together to Safeguard Children' 2023 and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing impairment of children's mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- **Neglect** is a form of abuse and is 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. Appendix 1 defines neglect in more detail.

- **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- **Children** includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- The School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Child-on-child abuse
  - Children with family members in prison
  - Children who are absent or missing from education
  - 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, also known as youth produced/involved sexual imagery or "Sexting"
  - Online safety
  - 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
  - Upskirting

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



## 1.4 Related Safeguarding Policies

- This policy is one of a series in the School integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
  - Behaviour, including behaviour management and use of physical intervention
  - Code of Conduct/Behaviour Policy
  - Online safety
  - Social media
  - Mobile and smart technology
  - Anti-bullying
  - Data protection and information sharing
  - Image use
  - Relationship Sex and Health Education (RSE)
  - PSHEE
  - Drugs Education, Tobacco & Alcohol, Substance Misuse
  - SEN Policy
  - Supporting pupils with medical needs
  - Mental Health & Emotional Well-being
  - Personal and intimate care
  - Health and safety
  - Attendance
  - Risk assessments (e.g. school trips, use of technology, school re-opening)
  - First aid and accidents including medication and managing illness, safer eating and allergies, health and safety, and infection
  - Managing allegations against staff
  - Staff Behaviour Policy/Code of Conduct, including Acceptable Use of Technology Policies (AUP)
  - Safer recruitment
  - Whistleblowing
  - Complaints
  - Confidentiality
  - Emergency procedures such as evacuations and lockdowns

### Supporting Guidance (to be read and followed alongside this document)

- “Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - [Safer Recruitment Consortium](#)
- “What to do if you are worried a child is being abused” – DfE, March 2015 [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](#)

## 1.5 Policy Compliance, Monitoring and Review

- The Charles Dickens School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2024 as appropriate. Copies of all such documents can be found on the School website, Sharepoint and in the staff room.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: [Welcome to The Charles Dickens School \(cds.kent.sch.uk\)](#)



- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead (DSL) and Headteacher will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

## 1.6 Equality Statement

Some children have an increased risk of abuse, both online and offline, 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.

We give special consideration to children who:

- › Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language (EAL)
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

## 2 Key Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour Policy
- › Pastoral support system
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

- The governing body have regard to the KCSIE 2024 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The governing body is aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
  - This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - For further information about our approaches to equality, diversity and inclusion, please access our schools' website.
- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The Headteacher will ensure that our Child Protection and Safeguarding Policies and procedures adopted by the governing body, are understood, and followed by all staff.
- The governing body will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The governing body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The school has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate

## 2.2 Designated Safeguarding Lead (DSL)

- The School has appointed Louise Kettle (Deputy Headteacher) a member of the senior leadership team, to act as our Designated Safeguarding Lead (DSL) and the Prevent Lead. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns ([lkettle@cds.kent.sch.uk](mailto:lkettle@cds.kent.sch.uk))
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The School has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:
  - Kirstin Cardus – CEO/Executive Headteacher (BCAT)
  - Warren Smith – Headteacher
  - Louisa Aubry – SG and CiC Manager
  - Sophie Tyler – SG and CiC Manager
  - Lauren Roden – AHT
  - Rolf Henderson – DHT (from 24/9/24)
  - Daniel Shepperson - AAHT
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2024. This includes but is not limited to:
  - Acting as the central contact point for all staff to discuss any safeguarding concerns
  - Maintaining a confidential recording system for safeguarding and child protection concerns
  - Coordinating safeguarding action for individual children.

- When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
  - Liaising with other agencies and professionals in line with KCSIE 2024 and WTSC 2023 by building strong multi-agency relationships to offer families tailored support.
  - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
  - Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
  - Managing and monitoring the school role in any multi-agency plan for a child.
  - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
  - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
  - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
  - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
  - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
  - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
  - Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
  - Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
  - Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
  - Liaising with the Headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

### **The Headteacher:**

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

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents/carers when their child joins the school and via the school website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

## 2.3 Members of Staff

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

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

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

- All members of staff have a responsibility to:
  - Provide a safe environment in which children can learn.
  - Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
  - Know what to do if a child tells them that they are being abused, neglected or exploited and understand the impact this can have upon a child.
  - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
  - Be prepared to identify children who may benefit from early help and understand the early help process and their role in it.
  - Understand the school safeguarding policies and systems.
  - Undertake regular and appropriate training which is regularly updated.
  - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - Know how to maintain an appropriate level of confidentiality.
  - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - Act in line with Teachers' Standards 2012 which state that teachers (including Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
  - New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
  - The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
  - The fact that children can be at risk of harm inside and outside of their home, at school and online
  - The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
  - That a child and their family may be experiencing multiple needs at the same time
  - What to look for to identify children who need help or protection

- Staff at The Charles Dickens School recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

Staff at The Charles Dickens School will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff and pupil codes of conduct.

## **2.4 Children and Young People**

- Children and young people have a right to:
  - Feel safe, be listened to, and have their wishes and feelings taken into account.
  - Confidently report abuse, neglect or exploitation, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
  - Contribute to the development of school safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

## **2.5 Parents and Carers**

- Parents/carers have a responsibility to:
  - Understand and adhere the relevant school policies and procedures.
  - Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm including online.
  - Seek help and support from the school or other agencies.

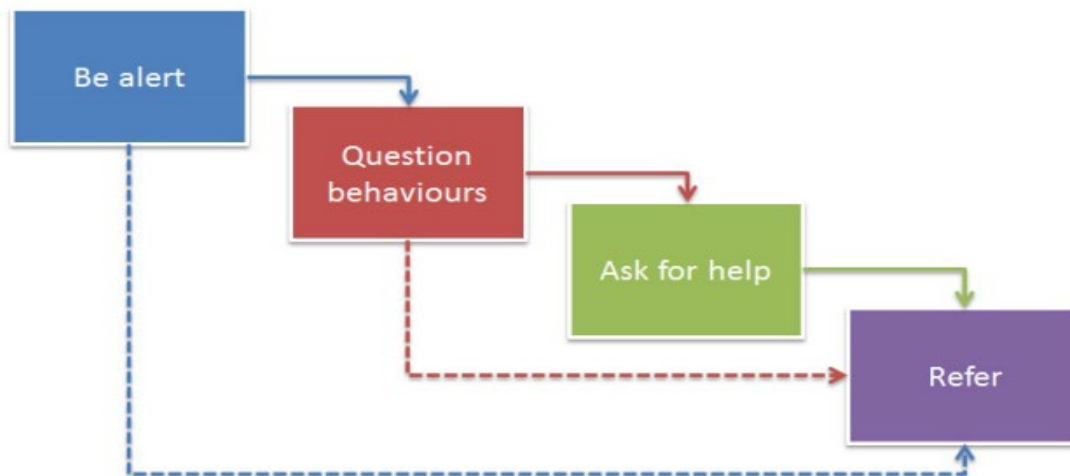
# **3 Child Protection Procedures**

## **3.1 Recognising Indicators of Abuse, Neglect and Exploitation**

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:
  - Is disabled
  - Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
  - Is a young carer
  - Is bereaved
  - Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
  - Is frequently missing/goes missing from education, care or home
  - Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - Is at risk of being radicalised or exploited
  - Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
  - Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - Is misusing drugs or alcohol
  - Is suffering from mental ill health
  - Has returned home to their family from care



- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
  - Is a privately fostered child
  - Has a parent or carer in custody or is affected by parental offending
  - Is missing education, or persistently absent from school, or not in receipt of full-time education
  - Has experienced multiple suspensions and is at risk of, or has been permanently excluded
  - Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. This is outlined locally within the [Kent Support Levels Guidance](#).
  - The Charles Dickens School recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
    - Physical abuse
    - Sexual abuse
    - Emotional abuse
    - Neglect
  - By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
  - All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



'What to do if you are worried a child is being abused' 2015

- The Charles Dickens School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- The Charles Dickens School recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.



- Parental behaviors can indicate child abuse, neglect or exploitation, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse, neglect or exploitation happening to themselves, their children or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse, neglect or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- The Charles Dickens School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- The Charles Dickens School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy which is informed by the DfE [‘Searching, screening and confiscation at school’](#) guidance.
  - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
  - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.
  - If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the safeguarding team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
  - Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

### 3.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to child, reflecting back the concern.
  - use the child's language.
  - be non-judgmental.
  - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern using the facts as the child presents them, in line with school record keeping requirements, including sign and dating the form
  - inform the DSL (or deputy), as soon as practically possible.
- Bear in mind that some children may:
  - not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - not recognise their experiences as harmful

- feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
  - none of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
  - The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information see flow chart on page 3. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
  - All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
  - The Charles Dickens School will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
    - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS) [Integrated Children's Services - KELSI](#). (ICS) and are accessed via the 'Front Door Service'/Kent Children's Services Portal [Childrens Portal \(kent.gov.uk\)](http://Childrens Portal (kent.gov.uk))
  - 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
    - If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
    - Where Intensive Support Early Help (provided by ICS, outlined in the [KSCMP support levels guidance](#)) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the [Kent Children's Services Portal](#).
    - Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
    - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.
  - Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, (for example, under section 17 or 47 of the Children Act), under section 17 or 47 of the Children Act), intensive or specialist support is required and a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the [portal](#)) and/or the police, in line with the [Kent Support Level Guidance and KSCMP procedures](#).
  - The Charles Dickens School recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
  - The DSL may seek advice or guidance from a social worker via the Front Door Service

- The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals. However, all staff are made aware of the local process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy). If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.
  - Staff will speak to a member of the The Charles Dickens School senior leadership team, request a consultation with a social worker from the Front Door Service, or make a request for support to the Front Door Service themselves; for contact information, see flowchart on page 4.
  - In these circumstances, any action taken by staff will be shared with a DSL as soon as is possible.
- In the event of a request for support to the Front Door Service being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will always be informed in the case of a request for support being submitted by The Charles Dickens School, unless there is a valid reason not to do so, for example, if informing them may put a child at risk of harm or could undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [Kent Escalation and Professional Challenge Policy](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- DSLs and staff will be mindful of the need for The Charles Dickens School, to ensure any activity or support implemented to support children and/or families is recorded. Support provided by The Charles Dickens School, where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.

### 3.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the green school safeguarding concern form and passed without delay to the DSL. Green forms are available in staff work rooms and the staff room, ACS can also deliver green forms to teachers' classrooms.
- DSLs will take action related to the concern, record this clearly on the green form, then sign and date the form. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken or not taken, decisions reached and outcomes. The DSL will record the green form and action taken on CPOMS – our secure electronic recording system. This includes instances where referrals were or were not made to another agency such as LA children's social care or Prevent.
- Paper copies of safeguarding concern forms are kept in individual confidential files in secure safeguarding filing cabinets. Files are organised alphabetically by year group.
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records are kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible: within 5 days for an in-year transfer or within the first 5 days of the start of the new term. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the special educational needs co-ordinators (SENCOs)/ named person with oversight for SEN, will be made aware of relevant information as required.
- Where a pupil/pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil/pupil, and if so, if the files have been sent.

### 3.4 Multi-Agency Working

- The Charles Dickens School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within Safeguard Children.
- The school leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies including the safeguarding partners in line with local and national guidance.
- The Charles Dickens School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The Charles Dickens School will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The Headteacher and DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school Behaviour Policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

### 3.5 Confidentiality and Information Sharing

- The Charles Dickens School recognises its duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2024.
- Where reasonably possible, the School will hold more than one emergency contact number for each pupil. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.
- The Charles Dickens 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 Headteacher, Mr Smith.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2024). KCSIE 2024, the [Information Commissioner's Office](#) (ICO) and the DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail information sharing principles and expectations. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- The Headteacher and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy. Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
  - Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved



- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on schools and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
  - The Charles Dickens School has an appropriately trained Data Protection Officer (DPO) as required to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. (DPO- Warren Smith)
  - All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
  - KCSIE, the [Information Commissioner's Office \(ICO\)](#), DfE [Data Protection in schools guidance](#) and DfE '[Information sharing advice for safeguarding practitioners](#)' guidance provides further details regarding information sharing principles and expectations.

### 3.6 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, pupils, members of staff and visitors who wish to report concerns or complaints. This can be found on the school website [Welcome to The Charles Dickens School \(cds.kent.sch.uk\)](https://www.cds.kent.sch.uk)
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- The leadership team at The Charles Dickens School will take all concerns reported to the School seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

## 4 Specific Safeguarding Issues

- The Charles Dickens School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2024 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

### 4.1 Child-on-Child Abuse

- All members of staff at The Charles Dickens School recognise that children can abuse other children; this is known as child-on-child abuse and can happen both inside and outside of school and online (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.
- The Charles Dickens School recognises that child-on-child abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - abuse in intimate personal relationships between children this is sometimes known as 'teenage relationship abuse')
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element, which facilitates, threatens and/or encourages sexual violence)
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2024 (in particular, part two and five)
- The Charles Dickens School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff 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.
- The Charles Dickens School recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, The Charles Dickens School will:
  - Engage with pupil voice to address concerns and encourage an open forum for discussion.
  - Continue to train peer mentors to support recognition of abuse and support children who disclose concerns, ensuring that these pupils are fully trained with safeguarding procedures to report concerns to a member of staff.
  - Introduce antibullying ambassadors as an addition to the peer mentors in 2023/24 to promote antibullying policies and processes.
  - Regularly survey pupils to ascertain concerns and develop pastoral support for groups and individuals.
  - Specifically teach about child-on-child abuse as part of our curriculum as well as during PSHEE and Enrichment Cultural Capital Days to enable pupils to recognize and respond appropriately where concerns are identified, as well as appropriate behaviour and consent



- Ensure all pupils know who to report concerns to and how to report concerns – all methods of communication can be used – in person, email, MS teams messages etc.
- 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 pupils are able to easily and confidently report abuse using our reporting systems (e.g. green button on TEAMS, incident report forms)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

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
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The Charles Dickens School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing
- Concerns about learner’s behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded

and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies. Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.

- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
  - Taking all reports seriously,
  - Listening carefully, taking note of both verbal and non-verbal communication
  - Avoiding victim blaming.
  - Providing appropriate pastoral support to be agreed in conjunction with the victim, the perpetrator and any other affected pupils, based on their individual needs.
  - Working with parents/carers, particularly to ensure out of school activities are monitored.
  - Reviewing educational approaches, with the aim to reduce the risk of further incidents.
  - Following procedures as identified in other policies e.g. the School Anti-Bullying, Behaviour and Child Protection policies
  - Where necessary and appropriate, informing the police and/or Integrated Children's Services (ICS).

## **4.2 Child on Child Sexual Violence or Harassment**

- When responding to concerns relating to child-on-child sexual violence or harassment, The Charles Dickens School will follow the guidance outlined in Part Five of KCSIE 2024.
- The Charles Dickens School recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' The Charles Dickens School recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can 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.
- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of The Charles Dickens School will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection.
- The Charles Dickens School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- The Charles Dickens School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other

children involved/impacted, in line with part five of KCSIE 2024 and relevant local/national guidance and support, and where applicable seek support from KCC Front Door Service.

- 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.
- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by The Charles Dickens School and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
  - the wishes of the victim in terms of how they want to proceed.
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
  - the ages of the children involved.
  - the 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 - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - understanding intra familial harms and any necessary support for siblings following incidents.
  - whether there are any ongoing risks to the victim, other children, adult pupils, or The Charles Dickens School staff.
  - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The Charles Dickens School will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Front Door Service. [Education Safeguarding Service](#).

### **4.3 Nude and/or Semi-Nude Image Sharing by Children**

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.

The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older pupils.

- The Charles Dickens School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed the imagery, this will be immediately reported to the DSL.
  - Not delete the imagery or ask the child to delete it.
  - Not say or do anything to blame or shame any children involved.
  - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
  - Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
  - 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.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate. The DSL will decide whether there is an immediate risk to pupil(s)
  - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
  - All decisions and action taken will be recorded in line with our child protection procedures.
  - A referral will be made to ICS via the Children’s Portal and/or the police immediately if:
    - the incident involves an adult (over 18). Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
    - 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 of the child or they have special educational needs.
    - 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, or are violent.
    - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
  - The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
    - If DSLs are unsure how to proceed, advice will be sought from the Front Door Service.
    - Education Safeguarding Service.

### **Further review by the DSL:**

If at the initial review stage a decision has been made not to refer to police and/or children’s social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children’s social care and/or the police immediately.

### **Curriculum coverage:**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

#### **4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- The Charles Dickens School recognises that 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 taking part in sexual or criminal 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. CSE and CCE 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.
- The Charles Dickens 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 which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. 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.
- The Charles Dickens School recognises that CSE can occur over time or be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse 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 CCE can include a child:
  - Appearing with unexplained gifts or new possessions
  - Associating with other young people involved in exploitation
  - Suffering from changes in emotional wellbeing
  - Misusing drugs and alcohol
  - Going missing for periods of time or regularly coming home late
  - 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
  - Regularly missing school or education
  - Not taking part in education



- CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. In addition to the CCE indicators above, indicators of CSE can include a child:
  - Having an older boyfriend or girlfriend
  - Suffering from sexually transmitted infections or becoming pregnant
- 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.

#### **4.5 Serious Violence**

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.
- Risk factors which increase the likelihood of involvement in serious violence include:
  - Being male
  - Having been frequently absent or permanently excluded from school
  - Having experienced child maltreatment
  - Having been involved in offending, such as theft or robbery
  - Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

#### **4.6 Modern Slavery**

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#)
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

#### **4.7 So-called Honour Based Abuse (HBA)**

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)
- FGM:

- Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM (for example- is informed by a girl under 18 that an act of FGM has been carried out on her or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth), there is a specific legal reporting duty on teachers.
  - 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 in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.
  - It will be rare for teachers to see visual evidence, and they should not be examining pupils, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).
  - Unless the teacher has good reason not to, they should still consider and discuss any FGM concerns with the designated safeguarding lead (or a deputy), and ICS should be informed as appropriate.

#### 4.8 Preventing radicalisation

- The Charles Dickens School recognises that children may be susceptible to radicalisation into terrorism.
- The Charles Dickens School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- All staff have received appropriate training to enable them to be alert to changes in children’s behaviour which could [indicate that they may need help or protection from radicalisation](#). All staff annually complete Prevent Training
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) ([The Prevent Duty In Education - KELSI](#)) in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.

**Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence

**Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

**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 of terrorism 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 Charles Dickens School is aware of its duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

The Charles Dickens School recognises that children are susceptible to extremist ideology radicalisation into terrorism and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.

Staff have a clear duty to ensure that both non-violent and violent extremism is reported, staff are able to make referrals without consent, using professional judgement to do so.

Staff assess the risks of pupils being drawn into terrorism, by using information from the KCC Prevent Team

Making school a safe place, where pupils can understand and discuss sensitive and controversial topics such as terrorism and extremist ideas and learn how to challenge them. Pupils’ resilience to radicalisation is built through the personal development curriculum; PSHE, Assemblies, Tutor Time, Enrichment, and external speakers.

All staff undertake relevant Prevent Training, so they are able to support the implementation of the Prevent Duty.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils’ behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Staff should always take action if they are worried.

The named DSL: Louise Kettle is the member of staff responsible for the Prevent Duty within the school.

Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures [The Prevent Duty In Education - KELSI](#) to follow. If there is an immediate threat, the police will be contacted via 999.

## 4.9 Cybercrime

- The Charles Dickens School recognises that children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

**Kent DSLs may also seek advice from Kent Police and/or the Front Door Service**

## 4.10 Domestic abuse

- The Charles Dickens School recognises that:
  - domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
  - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others.
  - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
  - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
  - Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
  - domestic abuse can take place within different types of relationships, including intimate partner violence, ex-partners, family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse.
  - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
  - domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
  - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
  - it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.

- The Charles Dickens School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the School when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
  - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
  - Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service front door 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 will be sought from the Front Door Service, Education Safeguarding Service or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.
  -
- **More information about the scheme and how schools can become involved is available on the [Operation Encompass School](#). Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990**
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.11 Mental health**

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

## **5 Supporting Children Potentially at Greater Risk of Harm**

- Whilst **all** children should be protected, The Charles Dickens School acknowledges that some groups of children are potentially at greater risk of harm. This can include the following groups:

### **5.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)**

- The Charles Dickens School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse neglect or exploitation. and neglect. Children with disabilities are 3 times more likely to be abused than their peers.

- The Charles Dickens School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse, neglect or exploitation, such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO (Mrs Jess Shaw) to plan support as required.
- Our school does not currently have any pupils who require intimate/personal care, however There are historical policies in place that are robust in order to ensure that the health, safety, independence and welfare of children is promoted, and their dignity and privacy are respected. If a A child requiring intimate or personal care will have two trained members of staff with robust record keeping in place.

## **5.2 Children Requiring Mental Health Support**

- The Charles Dickens School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where there are concerns regarding possible mental health problems for pupils, staff should:
  - Refer the concern to DSL or deputy, who will liaise with the relevant head of year to provide support.
  - The DSL and/or Head of Year will make contact with parents to seek consent for any relevant referral that may be required.
  - Following discussion with parents and the pupil in reference to their needs and wishes, referrals may be placed for the school counsellor, school health team or CYPMHS, as appropriate.
  - In addition to professional support, and/or whilst waiting for formal support to be in place, regular check-ins will be arranged with either the head of year, or another trusted adult within the school.
  - Head of Year will also make regular contact home to parents to ensure a coordinated and nurturing approach.
- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience. This will be delivered through tutor time, PSHEE and our enrichment programme.
- In addition, as a school, working towards the national nurturing schools programme additional support and training will be given to staff to enable them to more effectively identify and support young people's mental health and promote resilience and positive wellbeing for the adults within the community.

## **5.3 Children who are absent from education**

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

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM

- › Come from Gypsy, Roma, or Traveller families
  - › Come from the families of service personnel
  - › Go missing or run away from home or care
  - › Are supervised by the youth justice system
  - › Cease to attend a school
  - › Come from new migrant families
- A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
  - Where possible, CDS will hold more than one emergency contact number for each pupil, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern (see section 3.5).
  - Where the school/college have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

#### **5.4 Elective Home Education**

- Elective Home Education can mean that some children are not in receipt of suitable education. Many home educated children have a 'positive learning experience'.
- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#).
- We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

#### **5.5 Children who may benefit from Early Help**

- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is frequently missing/goes missing from education, home or care,
  - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a parent or carer in custody, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing alcohol and other drugs themselves

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - is a privately fostered child.
- Where it is identified a child may need early help, staff and DSLs will respond in line with section 3 of this policy.

## **5.6 Children who need a Social Worker (Child in Need and Child Protection Plans)**

- Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- The DSL will hold details of social workers working with children in the School so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

## **5.7 Looked after children, previously looked after children and care leavers**

- The Charles Dickens School recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and/or neglect and a previously looked after child also potentially remains vulnerable.
- The school has appointed a 'designated teacher' – Louisa Aubry and Sophie Tyler (CiC Managers) who work with local authorities including the [Home | Virtual School Kent \(lea.kent.sch.uk\)](http://lea.kent.sch.uk) to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them. The designated teacher will work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the School believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

## **5.8 Children who are Lesbian, Gay, Bi, or Trans (LGBT) gender questioning Children who are Lesbian, Gay, Bisexual, or Gender Questioning (LGBT)**

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.



- The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm, however, The Charles Dickens School recognises that children who are LGBTQ+ or are perceived by other children to be LGBTQ+ (whether they are or not) can be targeted by other children or others within the wider community.
- The Charles Dickens School recognises risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open LGBTQ+ is included within our Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.
- When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
- When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).
- 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). 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 be open. 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.

## 5.9 Children who are privately fostered

- [Private fostering](#) occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of the school, we must notify Kent Integrated Childrens Services in line with the local [KSCMP arrangements](#) in order to allow the local authority to check the arrangement is suitable and safe for the child.

## 6 Online Safety and the use of mobile technology

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Charles Dickens School will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:
  - Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones'). As per our Behaviour Policy, we are a mobile phone free school.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- The Charles Dickens School will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- The Charles Dickens School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

**To meet our aims and address the risks above, we will:**

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

### **Artificial intelligence (AI)**

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

The Charles Dickens School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

The Charles Dickens School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

### **Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
  - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)
- The Charles Dickens School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.

- The Headteacher will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

## 6.1 Policies and Procedures

- The DSL has overall responsibility for online safety within the School but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our Anti-Bullying, AUP and Behaviour policies.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The Charles Dickens School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- The Charles Dickens School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2024 The Charles Dickens School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found on the school website: [cds.kent.sch.uk](https://cds.kent.sch.uk)
- The Charles Dickens School recognises that generative artificial intelligence (AI) tools may have many uses which could benefit our The Charles Dickens School community. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
  - Staff and pupils/pupils will be made aware of the benefits and risks of using AI tools; list how this will be achieved, for example through specific lessons, staff training etc.
  - Staff are required to carry out a risk assessment and seek written approval from the senior leadership team prior to any use of AI in school.
  - The Charles Dickens School will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection.
  - Where the School believe that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the school will respond in line with the UKCIS guidance '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance.

## 6.2 Appropriate Filtering and Monitoring

- The Charles Dickens School will do all we reasonably can to limit children's exposure to online harms through school provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE and will ensure that appropriate filtering and monitoring systems are in place.
- When implementing appropriate filtering and monitoring, The Charles Dickens School will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our pupils; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.

- Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
- Internet use will be supervised by staff as appropriate to pupils age, ability and potential risk of harm e.g. use of Impero.

## Responsibilities

- Our governing body has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Marc Blake, a member of the senior leadership team and Stephen Beale, Chair of Governors, are responsible for ensuring that our school has met the DfE [Filtering and monitoring standards](#) for schools and colleges.
  - Our senior leadership team are responsible for
    - procuring filtering and monitoring systems.
    - documenting decisions on what is blocked or allowed and why.
    - reviewing the effectiveness of our provision.
    - overseeing reports.
    - ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
    - ensuring the DSL and IT staff have sufficient time and support to manage their filtering and monitoring responsibilities.
  - The DSL has lead responsibility for overseeing and acting on:
    - any filtering and monitoring reports.
    - any child protection or safeguarding concerns identified.
    - checks to filtering and monitoring system.
  - The IT staff have technical responsibility for:
    - maintaining filtering and monitoring systems.
    - providing filtering and monitoring reports.
    - completing technical actions identified following any concerns or checks to systems.
    - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.
- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

## Decision making and reviewing our filtering and monitoring provision

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT staff. Decisions have been recorded and informed by an approach which ensures our systems meet our school/college specific needs and circumstances, including but not limited to our pupil risk profile and specific technology use.

- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our school/college undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.
- A formal review of your filtering and monitoring systems should be done as a minimum annually, and revisited if a safeguarding risk is identified, if there is a change in working practice (such as remote access or 'Bring Your Own Device' (BYOD)), or any new technology use is introduced. The review should be conducted by members of the senior leadership team, the DSL, and IT staff/IT service provider and involve the governor with responsibility for safeguarding. The results should be recorded for reference and made available to those entitled to inspect that information. Please access the DfE [filtering and monitoring standards](#) for further advice and information.
- In addition, our school undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the governing body that we are meeting our safeguarding obligations.
- These checks are achieved by:
  - termly checks are undertaken by a DSL, checks are undertaken with two members of staff present, checks are undertaken in a location where confidentiality can be achieved, during working hours, when pupils/pupils are not present (e.g. headteachers office), checks are logged/recorded, any technical concerns are flagged to the IT staff/IT service provider and safeguarding concerns are actioned by the DSL etc.in line with this policy.
  - KCSIE signposts to [Test Filtering](#) to check filtering systems.

## Appropriate filtering

- The Charles Dickens School's education broadband connectivity is provided through Exa Networks and The Charles Dickens School uses SurfProtect Quantum+ Internet filtering.
  - Exa Networks and Impero Software are members of the [Internet Watch Foundation](#) (IWF).
  - Exa Network, and their filtering provision, SurfProtect, and Impero Software have signed up to the Counter-Terrorism Internet Referral Unit list (CTIRU).
  - SurfProtect is blocking access to illegal content including child sexual abuse material (CSAM).
  - SurfProtect blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- The Charles Dickens School also utilises Impero Education Pro software to monitor usage, and employs keyword detection to deter inappropriate behaviour and highlight safeguarding incidents.
- We filter internet use on all school owned, Internet enabled, devices and networks. This is achieved by:
  - All Internet usage within school is subject to filtering by SurfProtect. This uses the account logged into the device to apply appropriate filtering based on the user's role – e.g. 11-16 pupil, Sixth Form, or Staff.
  - Staff are reminded of the importance of not allowing pupils to use staff devices to ensure the pupils' Online Safety, as well as adhering to Data Protection standards.
  - Impero monitoring is utilised to identify any concerns originating from both Internet usage, and wider technology usage, that may present a cause for concern.
  - Offsite access is not actively filtered, but staff devices are monitored by the Impero software.
  - Where devices are loaned to pupils, parents agree to hold responsibility for appropriate use.
  - Where BYOD (Bring Your Own Device) Internet access is provided, this is filtered by SurfProtect at the appropriate level for the user, but not monitored by Impero.



- Pupil are not permitted to use guest accounts for Internet access to ensure appropriate monitoring of usage can occur.
  - Where Guest Internet access is provided, this is filtered at a Sixth Form level, but not monitored by Impero.
  - Both SurfProtect and Impero allow identification of the user device names or IDs, IP addresses, and where possible, individual users, the time and date of attempted access and the search term or content being blocked.
- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school/college owned devices and networks, and all devices using the school/college broadband connection.
  - We work with Exa Networks Limited and our Trust ICT Team to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
  - If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
    - Immediately ensure the individual accessing the content ceases and desists.
    - Immediately report the issue to both the on-site ICT Team and Trust ICT Team, highlighting the nature of the incident and the appropriate URL of the concern if appropriate.
    - Bring the matter to the attention of the DSL via the appropriate method for reporting a concern if the failure raises an Online Safety or Safeguarding concern.
  - Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our Child Protection, ICT Acceptable Use, ICT, Allegations Against Staff and Behaviour policies.
  - Parents/carers will be informed of filtering breaches involving their child.
  - Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material), [Kent Police](#), [NCA-CEOP](#) or [Kent Integrated Children's Services via the Kent Integrated Children's Services Portal](#).
  - If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the ICT Team and/or DSL and/or leadership team if appropriate.

## Appropriate monitoring

- We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:
  - Ensuring that ICT usage by lower year groups is physical supervised.
  - Utilising the Impero monitoring software to actively monitor usage by the supervising member of staff.
  - Utilise the logging functionality of Impero to retrospectively identify any concerns originating from both Internet usage, and wider technology usage, that may present a cause for concern.
  - Access on non-school devices – such as BYOD or Guest access where this is provided is not monitored but is filtered as described above.
  - School devices are monitored by Impero when off-site.
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation. This is detailed in both the Acceptable Use and Trust ICT Policies.

- If a concern is identified via our monitoring approaches:
  - Where the concern relates to pupils/pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - Where the concern relates to staff, it will be reported to the Headteacher (or Chair of Governors if the concern relates to the Headteacher), in line with our staff behaviour/allegations policy.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, [Kent Police](#) via 101, [NCA-CEOP](#), LADO or [Kent Integrated Children's Services via the Kent Integrated Children's Services Portal](#).

### **6.3 Information Security and Access Management**

- The Charles Dickens School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in the online safety policy and acceptable usage policy.
- The Charles Dickens School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
- Louise Kettle, a member of the senior leadership team and Stephen Beale, Chair of Governors, are responsible for ensuring that our school has met the DfE [cyber security standards](#) for schools and colleges.

### **6.4 Remote/Online learning**

- The Charles Dickens 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 pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems. The school system used for remote education is Microsoft Teams, part of the Windows 365 package.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage in remote teaching and learning in line with existing behaviour principles as set out in our school Behaviour Policy/Code of Conduct and Acceptable Use Policies.
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our 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. The Charles Dickens School will continue to be clear 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 parent controls are implemented at home.

### **6.5 Online Safety Training for Staff**

- The Charles Dickens School will ensure that all staff receive online safety training which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.
- The Charles Dickens School has recognition for this work as a National Online Safety School since 2022.

## 6.6 Educating Pupils

- The Charles Dickens School will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See Section 9 for more information.

## 6.7 Working with Parents/Carers

- The Charles Dickens School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
  - Providing training as part of NOS accreditation.
  - Send regular update emails highlighting risks of specific online activities.
  - Keep an open dialogue so parents/carers feel able to report concerns and seek support.
- The Charles Dickens School will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:
  - Clear expectations with the acceptable usage policy that all pupils and staff sign upon joining the school.
  - Clear communication throughout the academic year, particularly if any new systems are introduced (such as Microsoft teams), or any systems are changed at any point.
- Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

# 7 Staff Engagement and Expectations

## 7.1 Staff Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2023 2024 which covers safeguarding information for staff.
  - School leaders, including the DSL will read KCSIE in its entirety.
  - School leaders and all members of staff who work directly with children will read annex B.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This information will be compiled and held centrally on a spreadsheet, which will be periodically checked by the DSL.
- It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are

aware of the school internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners and explores the Kent processes to follow. This will be achieved, via leaflets, specific training from the DSL, e-Learning where applicable.

- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. This will be achieved through annual INSET training.
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. This will be achieved through specific online safety training, annual updates and face to face training.
- All Governors and Trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated by a combination of face to face training with the DSL and additional online training as part of the governor training expectations.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Weekly update emails to address contextual safeguarding issues will be shared with all staff and a full programme of online training is in place to supplement the annual training delivered by the DSL.
- The Charles Dickens School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies. This will be achieved through pastoral meetings and WWF (staff voice) meetings, as well as the termly DSL forum meetings.
- The DSL and Headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained. In addition, a safeguarding report is presented at each of the governor meetings throughout the academic year.

## **7.2 Safer Working Practice**

- Our school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school behaviour policy/code of conduct.
- The DSL will ensure that all staff and volunteers (including contractors) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff Behaviour Policy/Code of Conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff Behaviour Policy, Acceptable Use Policies, and social media.

### **7.3 Supervision and Support**

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **8 Safer Recruitment and Allegations Against Staff**

### **8.1 Safer Recruitment and Safeguarding Checks**

- The Charles Dickens School is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
  - The Charles Dickens School will follow relevant guidance in Keeping Children Safe in Education 2024 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
  - The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  - The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The School maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Charles Dickens School is 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 pupil with an alternative provision provider, the School will continue to be responsible for the safeguarding of that child and will need to satisfy ourselves that the provider can meet the needs of the pupil.
  - The School will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school would otherwise perform in respect of our own staff.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in part three of KCSIE 2024.

- Where the school organises homestays as part of exchange visits, we will follow the advice and guidance as identified in part Three and Annex E of KCSIE 2024.

## **8.2 Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors**

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and the [local Kent allegations arrangements](#) including discussions as necessary with the Local Authority Designated Officer (LADO). In depth information can be found within our 'Managing Allegations against Staff' and/or staff Code of Conduct Policy. This can be found on the school website and on Sharepoint.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where the Headteacher is unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteacher (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.
- In a situation where the School receives an allegation relating to an incident that happened when an individual or organisation was using our 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.

### **8.2.1 Concerns that meet the 'harm threshold'**

- The Charles Dickens School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has
  - behaved in a way that has harmed a child, or may have harmed a child and/or
  - possibly committed a criminal offence against or related to a child and/or;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the headteacher who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO.

### **8.2.2 Concerns that do not meet the 'harm threshold'**

- The Charles Dickens School may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained in our staff Code of Conduct – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
  - The Charles Dickens School has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables



us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

- A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
- Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our staff code of conduct to Warren Smith Headteacher.
  - Where low-level concerns are reported to the school, the Headteacher will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
  - The Headteacher will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
  - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
  - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded on CPOMS staff safe in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

### 8.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff behaviour policy/code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at The Charles Dickens School will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

- The Charles Dickens School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or 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 Judicium (personnel provider).

## 9 Opportunities to Teach Safeguarding

- The Charles Dickens School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and Health Education
- We recognise that school plays an essential 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-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.
- The Charles Dickens School recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- The Charles Dickens School has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our Behaviour Policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- The Charles Dickens School recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse neglect or exploitation and children with SEND.
- Our school systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

## 10 Physical Safety

### 10.1 Use of 'reasonable force'

- 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 and is in line with the DfE '[Use of reasonable force in schools](#)' guidance.

### 10.2 The Use of Premises by Other Organisations

- Where our school facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

- Where those services or activities are provided under the direct supervision or management of our school staff, our existing arrangements for child protection, including this policy, will apply.
- Where services or activities are provided separately by another body using the school facilities/premises, the Headteacher and governing body will seek assurance that the provider 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 for the provider to liaise with the school/college on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

### 10.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site. There are different visitor lanyards for people with (pink) and without (red) a DBS check.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. Members of staff are expected to speak to the individual themselves, children are expected to report immediately to a member of staff.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## 11 Local Support

- All members of staff in The Charles Dickens School are made aware of local support available.
  - **Kent Integrated Children's Services/ Children's Social Work Services**
    - [Childrens Portal \(kent.gov.uk\)](https://www.kent.gov.uk/childrens-portal)
    - Front Door Service: 03000 411111
    - Out of Hours Number: 03000 419191
  - **Local Early Help and Preventative Services and Family Hubs**
    - Local links/networks can be found at:
      - [Early Help and Preventative Services - KELS](#)
      - [Early Help contacts - KELS](#)
      - [Kent Family Hubs - Kent County Council](#)
  - **Education Safeguarding Service**
    - **Area Safeguarding Advisor (East Kent)**
      - **Myles O'Keeffe: 03301 651140**
    - **Online Safety in the Education Safeguarding Service**
      - 03301 651500
      - [onlinesafety@theeducationpeople.org](mailto:onlinesafety@theeducationpeople.org) (non-urgent issues only)
  - **LADO Service**
    - Telephone: 03000 410888

- Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
- **Integrated Children's Services**
  - Front Door: 03000 411111
  - Out of Hours Number: 03000 419191
- **Early Help**
  - [Thanet - KELS](tel:03000419567) - 03000 41 95 67
  - [ThanetEarlyHelp@kent.gov.uk](mailto:ThanetEarlyHelp@kent.gov.uk)
- **Kent Police**
  - 101 or 999 if there is an immediate risk of harm
  - PCSO: Claire Davison PC 46014733 [Claire.Davison@kent.police.uk](mailto:Claire.Davison@kent.police.uk)
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
  - [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - 03000 421126
- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)
- **Prevent Education Officer**
  - Rachel Murray South & East Kent 03000 413565 [Rachel.murray@kent.gov.uk](mailto:Rachel.murray@kent.gov.uk)  
[The Prevent Duty In Education - KELS](#)

# Appendix 1: Categories of Abuse

**All staff should be aware that abuse, neglect, exploitation and other 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.**

**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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

**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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

## Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

**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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Signs that MAY INDICATE emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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

### **Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with children
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem



## Appendix 2: Support Organisations

### NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for Children: [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Children's Society: [www.childrensociety.org.uk](http://www.childrensociety.org.uk)
- Centre of Expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

### Support for Staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

### Support for pupils/pupils

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

### Support for Adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Advice now: [Advicenow](http://Advicenow)
- 

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

### Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

### Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

### Substance Misuse

- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

### Domestic Abuse

- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: <https://respectphonenumber.org.uk>

### **Criminal and Sexual Exploitation**

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals: [www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit](http://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit)

### **Honour Based Abuse**

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- 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](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](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- The right to choose - government guidance on forced marriage: [www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage](http://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage)

### **Child-on-Child abuse, including bullying, sexual violence and harassment**

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Diana Award: [www.antibullyingpro.com/](http://www.antibullyingpro.com/)
- Bullying UK: [www.bullying.co.uk](http://www.bullying.co.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

### **Online Safety**

- NCA-CEOP: [www.ceop.police.uk](http://www.ceop.police.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>

- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you: [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)

#### **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

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

National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>