



and



INTERNATIONAL COLLEGE

SAFEGUARDING AND CHILD PROTECTION POLICY

Person responsible: Designated Safeguarding Lead
Reviewed: September 2023

School statement of commitment to safeguarding

The safety and wellbeing of all of our pupils is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop their full potential and feel positive about themselves as an individual. All pupils should care for and support each other. To that end all staff are required to follow this policy and to attend any training when required to do so.

The school's policy is based on and is in accordance with the following legislation:-

- The Children's Act 1989
- Education Act 2002
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges, 2021
- Working Together to Safeguard Children (WT), 2018
- Keeping Children Safe in Education (KCSIE) 2023
- Kent Safeguarding Children Multi-agency Partnership Arrangements (KSCMP)

1. Designated Safeguarding Lead

The overall Designated Safeguarding Lead (DSL) for the three branches of the King's School is:

Miss Tanya Lee, Deputy Head (Pastoral)

The Designated Safeguarding Lead is responsible for safeguarding and child protection at The King's School. The key role of the Designated Safeguarding Lead is to:

- manage referrals from school staff or any others from outside the school.
- work with external agencies and professionals on matter of safety and safeguarding.
- undertake training.
- raise awareness of safeguarding and child protection amongst the staff and parents
- ensure that child protection information is transferred to the pupil's new school
- be aware of pupils who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

The King's School works in line with the policies provided by Kent Safeguarding Children Multi-agency Partnership Arrangements (KSCMP). The DSL is the designated member of staff who has responsibility for liaising with all agencies as outlined by KSCMP. The restructuring that has recently taken place means that all concerns about pupils are directed through the Education Safeguarding Service for Kent and all allegations about staff are directed to the county LADO team (contact details are at the end of this document).

Mr Luke Illsley, Safeguarding Coordinator (Deputy Designated Safeguarding Lead)

The Safeguarding Coordinator oversees all operational aspects of safeguarding and child protection at The King's School. Although the DSL is responsible for Safeguarding and Child Protection at The King's School, the Safeguarding Coordinator will support the DSL to carry out

their roles and responsibilities. The Safeguarding Coordinator is not a member of the academic staff in order to ensure that all concerns, queries, and referrals are dealt with efficiently and as a matter of priority.

- (i) At The King's School in the absence or unavailability of the DSL or Safeguarding Coordinator, the deputy Safeguarding leads (DDSL) are:

Mr Matthew Thornby, Head of Boarding Practice

Mr Greg Hunter, Deputy Head (Co-Curricular)

Mrs Amanda Conlan, Senior Nurse and Health Centre Manager

See Appendix 3 for further information regarding the individual responsibilities of the members of the team.

- (ii) The International College team and process is outlined in full at point 8 below
- (iii) The Junior King's School team and process is via their own policy available on the Junior School website

All members of the Safeguarding team attend update training meetings every two years, although they frequently update their qualifications more regularly than this through regular attendance at conferences and area meetings.

Contact numbers for the above can be found on page 19.

At the start of each academic year all are required to sign to state that they have read and understood the KCSIE document, the School's Child Protection and Safeguarding Policy, the Staff Behaviour Policy, and the school's ICT Acceptable Use Policy. Records of this are kept in the HR department.

As a part of the induction into school all new members of staff are required to read and sign for both the Safeguarding and Child Protection leaflets that are sent to them as part of their contract and the Part One of the Keeping Children Safe in Education (KCSIE) document which the DfE requires all staff working in schools to have read. New academic staff, sports graduates and boarding staff are also asked to complete online child protection training before arriving at school. Very soon after joining the school, all new members of staff are given a Safeguarding briefing by the Safeguarding Coordinator. This will give them relevant information on how they should react if they have any child protection concerns, and who they should talk to, and it emphasises the fact that although referrals are usually managed by school staff, anyone can refer a child to children's social care if necessary. All staff are updated in procedures either by the DSL or by a representative from the Kent Safeguarding Board or through online training on a regular, rolling cycle. All records of training are maintained in the HR department.

2. School Governor

The school Governor with particular responsibility for Safeguarding and Child Protection is:
Dame Frances Judd

The school Governor with particular responsibility for Safeguarding and Child Protection is

responsible for liaising with the DSL over all matters regarding child protection issues. The role is strategic rather than operational and they will not be involved in concerns about individual pupils. The school Governor with particular responsibility for Safeguarding will liaise with the DSL to produce an Annual Safeguarding Report for Governors. The Safeguarding Policy is reviewed and tested annually by Governors to ensure that all procedures have been discharged with efficiency and to ensure swift remediation of any deficiency in policy or procedures. The school Governor with particular responsibility for Safeguarding and Child Protection and the DSL regularly review all Safeguarding processes in School.

All Governors have a responsibility for Safeguarding in School and either the DSL or Safeguarding Coordinator provide annual safeguarding training and updates for all governors at the annual Canterbury meeting of the full board in November/December.

3. Aims

The central aim of the policy and training is to ensure the safety and well-being of pupils in line with the above legislation. More specifically, the aims are: -

- To ensure that all staff understand that everyone is responsible for the welfare of the children, and that it is everyone's responsibility to ensure that the best interests of the child are safeguarded at all times.
- To educate pupils on how to keep safe and how to recognise behaviour that is not acceptable.
- To recognise and support any child who has been subject to abuse.
- To ensure that all staff employed at the school understand their responsibility to be alert to signs of child abuse and to refer any concerns to Luke Illsley, Safeguarding Coordinator or to Tanya Lee, the Deputy Head (Pastoral), the DSL, (or in their absence to any of the Deputy Safeguarding Leads).
- To ensure that new staff are only appointed when all the appropriate checks have been made.
- To deal appropriately with every suspicion or complaint of abuse.
- To design and operate procedures which promote this policy.
- To design and operate procedures, which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.
- To support children who have been abused in accordance with his/her agreed child protection plan.
- To be alert to the medical needs of children with medical conditions.
- To be alert to the needs of pupils with special educational needs and disabilities
- To take all practicable steps to ensure that school premises are as secure as circumstances permit.
- To assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area.
- To identify children who may be vulnerable to radicalisation and know what to do when they are identified.
- To have regard to regulations and standards issued by the Secretary of State for Education (DfE) and sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and associated regulations.

- To be alert to when an issue would come under the category of Serious Violence (KCSIE).

These aims are effected by the following means:-

- **Education:** Through the curriculum, particularly but not solely through Life Matters (Personal, Social and Health Education) lessons, the school aims to teach pupils to understand what is 'acceptable behaviour' and to speak up if they believe they or others are not being treated appropriately. The school's Online Safety policy also provides clear guidance with regards to safeguarding. Both the DSL and one of the DDSLs are CEOPS ambassadors and training in this area is offered to all staff on a regular basis.
- **School intranet and house noticeboards:** all pupils and staff can refer to the section on "Who Can Help You". Notices include names and telephone numbers of the School's Independent Listener, the Duty Officer at the Front Door Services Department, the Education Service Safeguarding Advisor, the Children's Commissioner for England and Child Line.
- **School Rules:** Are available on the intranet and copies are available to all pupils in house and, these include the sanctions for pupils found guilty of any form of bullying.
- **Staff Training:** Safeguarding and child protection training for all academic and pastoral staff is undertaken regularly as advised by the Kent Safeguarding Board. For staff recruited between these training sessions, Safeguarding and Child Protection forms part of the Induction Programme. All staff and volunteers are provided with induction training that includes safeguarding and child protection. Temporary staff and voluntary staff who work with our children are to be made aware of the school's arrangements and attend a training session with the DSL or a DDSL. In addition, the school has recently rolled out a programme of regular electronic training updates.
- The DSL and the DDSLs have been fully trained for the demands of this role in child protection and inter-agency working. The DSL and the Safeguarding Coordinator attend update and review training by the Education People (the KSCMP training provider) annually, the DDSLs attend or complete online updates every two years. The school's Designated Safeguarding Team is responsible for the training of all support staff in Safeguarding and Child Protection issues. Records of all those who have attended safeguarding training are kept centrally in HR.
- All appropriate members of staff have received Safer Recruitment training. For details, please refer to the School's policy on Safer Recruitment.
- Part of the training given to staff is guidance on how to ensure that their behaviour and actions do not place themselves at risk of allegations of abuse to a pupil. Advice is given about one-to-one tuition, one- to-one music lessons, sports coaching, conveying a pupil by car and engaging in inappropriate electronic communication with a pupil. These guidelines are available in the Staff Handbook section of the intranet. The school also has policies for Staff Behaviour, the Use of Force to Control or Restrain Pupils, Missing pupil guidance and Whistleblowing which are relevant in this context.
- **Staff Handbook:** This online handbook contains the school's anti-bullying policy

and the Safeguarding procedures as well as the policies named above. It is available on the school's intranet.

- Also included in the Staff Handbook is the **Staff Behaviour policy** which gives further clarity and emphasises that safeguarding is everyone's responsibility.
- **Disclosure and Barring Service (DBS) Checks:** An enhanced DBS disclosure is required for all new appointments to the school (see Safer Recruitment Policy). The school also insists on enhanced DBS checks for all drivers of taxis and coaches used by the School and has robust processes to check the suitability of contract staff and others working on the school site or on off-site activities. The school is committed to reporting to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used, and the DBS referral criteria are met.
- **Other recruitment checks:** These are carried out in line with KCSIE documentation including running the checks on the Employer Access online service. All checks are carried out through the school's HR department. More detailed information may be found in the Staff Recruitment policy. All records are kept via the Single Central Register (SCR) and in the HR files.
- Where pupils participate in activities where they are supervised by staff from another organisation assurance is gained that the staff have been checked for suitability to supervise the school's pupils. When it is not possible to obtain this information a member of the school's staff will remain with the pupils at all times.

4. Procedures

It is recognised that children need protection from:-

- Physical harm
- Emotional abuse
- Sexual abuse
- Neglect
- Harmful material on the internet
- Sexual harassment

In line with KCSIE we also recognise these specific safeguarding issues:

- **Child on Child abuse:** Child on Child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Child on Child abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence. Abuse by children could take the forms of upskirting, banter and online abuse. In line with the guidance a separate **Child on Child Abuse policy** is in place and available in the staff handbook. Staff are required to re-read this policy whenever an update is issued.

- **Harassment:** As a school, we recognise that the culture of sexual harassment must change as stated in the Ofsted review in June 2021. We want to create a culture where every single member of the school community can challenge unacceptable behaviour as well as knowing that any incident of harassment will be taken seriously. To that end, a QR coded poster is displayed around the school whereby any member of the school community can immediately report any type of harassment.
- **Children missing from education:** see separate policy in the staff handbook.
- **Children Absent from Education:** Children absent from education is different from children missing from education. Children absent from education are still on roll at a school however are not attending for various reasons. Children missing from education are not on roll at a school.
- **Child sexual exploitation (CSE):** Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology. (Statutory Definition DfE February 2017).

At King's, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

- **Female genital mutilation (FGM):** professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Statistically, victims of FGM are more likely to come from a community that is known to practise FGM, but it is vital that staff are watchful for the key indicators regardless of the pupil's background. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. From October 2015 every adult who is concerned about a child who may be at risk of FGM has an obligation to report this (see Appendix).

Risk factors for FGM include:

- low level of integration into UK society

- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM:

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

- **Domestic Abuse:** In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition - The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse.
- (b) violent or threatening behaviour.
- (c) controlling or coercive behaviour.
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and 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.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

- **Radicalisation and the Prevent duty:**

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Honour based Abuse: So-called 'honour-based' abuse (HBA) encompasses 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 forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the

Designated Safeguarding Lead as a matter of urgency.

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

- **Criminal Exploitation:** Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes. '**County lines**' is when gangs and organised crime networks exploit children and young people to sell drugs. Often these individuals are made to travel across **counties**, and they use dedicated mobile phone '**lines**' to supply drugs. Criminal exploitation is not just exclusively 'county lines' or drug dealing, as criminal exploitation can take many forms. As in sexual exploitation, children and young people may consent to such acts without realising that they are being exploited.
- **Private Fostering:** is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a **private** arrangement made between a parent and a carer, for 28 days or more. It is recognised that the local authority must be informed when such arrangements are in place for a child at the school.
- **Serious Violence:** under KCSIE this is now recognised as a specific safeguarding issue. New guidance states that "all staff should be aware of the indicators, which may signal that children are at risk from, or are involved in serious violent crime."
- **Forced Marriage:** As of February 2023, it is illegal to marry until an individual is 18 years old. Any behaviour that would encourage an individual to marry whilst under the age of 18 must be reported even if the behaviour does not involve coercive or controlling behaviour.
- **Mental Health:** We take all matters of mental health very seriously here at King's. We have a Health Centre which is staffed by qualified nurses 24/7 during term time. We have a team of counsellors (four) and a life coach. We have links with the local CAMHS network. If our internal staff are unable to support a pupil's mental health needs we have good contacts at a local Psychology and Health Service clinic. Pupils are introduced to services at their induction, are reminded through house notices and assemblies of who they can contact, and are taught about mental health issues in our Life Matters programme.
All staff at King's are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.
If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by informing the designated safeguarding lead or a deputy either via CPOMS, emailing safeguarding@kings-school.co.uk or speaking to them in person.

Children with special educational needs or disabilities (SEND)

Children with special educational needs or disabilities (SEND), Additional Educational Needs (AEN) or certain health conditions can face additional safeguarding challenges. King's School acknowledges additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

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

At King's we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. For more information, please refer to the SEND policy. *(see Appendix 2 for full details of all of the above issues as well as other concerns to be aware of)*

Action by school staff

All members of staff at the school should have an understanding of Safeguarding and Child Protection issues and should appreciate the importance of their vigilance. The school also has a Whistleblowing Policy which is available in the Staff Handbook section of the intranet.

The school recognises that it has a duty to protect children who have suffered or who are likely to suffer significant harm, and also that it has a duty to provide support for those who are in need of additional support from one or more agencies. These will be reported to the Front Door Services by the DSL/Safeguarding Coordinator, the Front Door services will advise as to which inter-agency assessment processes will be followed. All will be managed in school by the DSL or one of their deputies. If the child is deemed to be at risk of serious harm then the guidance for care as given by the local Education Safeguarding Service Advisor, or other appropriate authority, will be followed. It is recognised that risks to children are not only those imposed by adults or other pupils, but also by issues such as self-harm, where expert advice may be needed and where the School's Self Harm policy procedures will be followed.

KSCIE 2023 Point 463, in relation to child-on-child abuse and the intervention of external agencies, says *"Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required."*

Members of staff may suspect a case of abuse from a variety of sources:

- a pupil discloses to them personally
- from behaviour of, or marks on, the pupil (e.g. bruises, welts, lacerations, abrasions)
- indications through schoolwork
- a pupil informs them that he/she knows or suspects that another pupil is being abused
- another third party informs them that he/she knows or suspects that a pupil is being abused.

Child abuse can take many forms and a summary of the possibilities can be found

detailed in Appendix 2.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated or are being threatened. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

5. Disclosure

If a pupil starts to disclose, the following procedures are essential:

- **REASSURE** the pupil that she/he is right to tell and is not to blame.
- **CONFIDENTIALITY: DO NOT** promise confidentiality, explain that you have to make sure that the pupil is safe and may need to ask other adults to help you to do this.
- **IT IS CRUCIAL THAT YOU DO NOT QUESTION THE PUPIL** let the pupil tell you what she or he wants to and no more. The pupil may have to disclose to a specialist later and too much detail now may interfere with later investigations.
- **LISTEN CAREFULLY** and repeat the pupil's words. When the pupil has finished, make sure that she/he feels secure; explain what you are going to do next.
- **FOLLOW UP BY** making arrangements with the pupil to speak to them later. They have chosen you as an adult they can trust.
- **REPORT WITHIN 24 HOURS : (more details below)** Record incident on CPOMS which will alert a member of the Safeguarding Team. It is important to record as much as you can remember using the pupil's own words. Write facts and information only, taking care to avoid opinion. A specific safeguarding incident/concern form is shown at Appendix 1 and is available as a word document on the INTRANET.
- **DO NOT ATTEMPT ANY EXAMINATION** or remove a pupil's clothes to look further at an injury.
- Under no circumstances should photographs be taken of a pupil's injury. The pupil should only be examined by an appropriate medical professional.

Follow up: The Deputy Head (Pastoral) (DSL) or the Safeguarding Coordinator will contact the Integrated Front Door services, in accordance with KSCMP Procedures. This initial conversation held with these services within the 24 hours of reporting may be on a 'no names' consultation basis in order to determine whether the referral needs to take place. No member of the school staff shall conduct an investigation concerning child abuse. This will be done by Front Door Services and/or the police.

The DSL or the Safeguarding Coordinator will inform parents before a referral of a child is made to the Front Door Services or to the Police, except where it appears that the abuse has been carried out by a parent. The agreement of the child's parents should be obtained in writing **providing** this will not place the child at an increased risk of harm. Advice on this may be sought from the Education Safeguarding Service Advisor. If the child is deemed to be at risk of serious harm then the guidance for care as given by the Education Safeguarding Service Advisor, or other appropriate authority, will be followed.

Reporting records of concern

Colleagues are required to report a concern in two phases via CPOMS:

Phase 1: For immediate help and support complete a CPOMS safeguarding report (guidelines are on the intranet if required).

(if you do not have access to CPOMS then the safeguarding team monitor a designated email account: safeguarding@kings-school.co.uk BUT CPOMS should be used by all who have an account)

The safeguarding incident report can be used by staff to call for help by any member of the team whilst they are hearing a disclosure, or it can be used to report any concerns about a student so that any patterns can be noted, and if necessary investigated, by the team. When reporting colleagues are required to include:

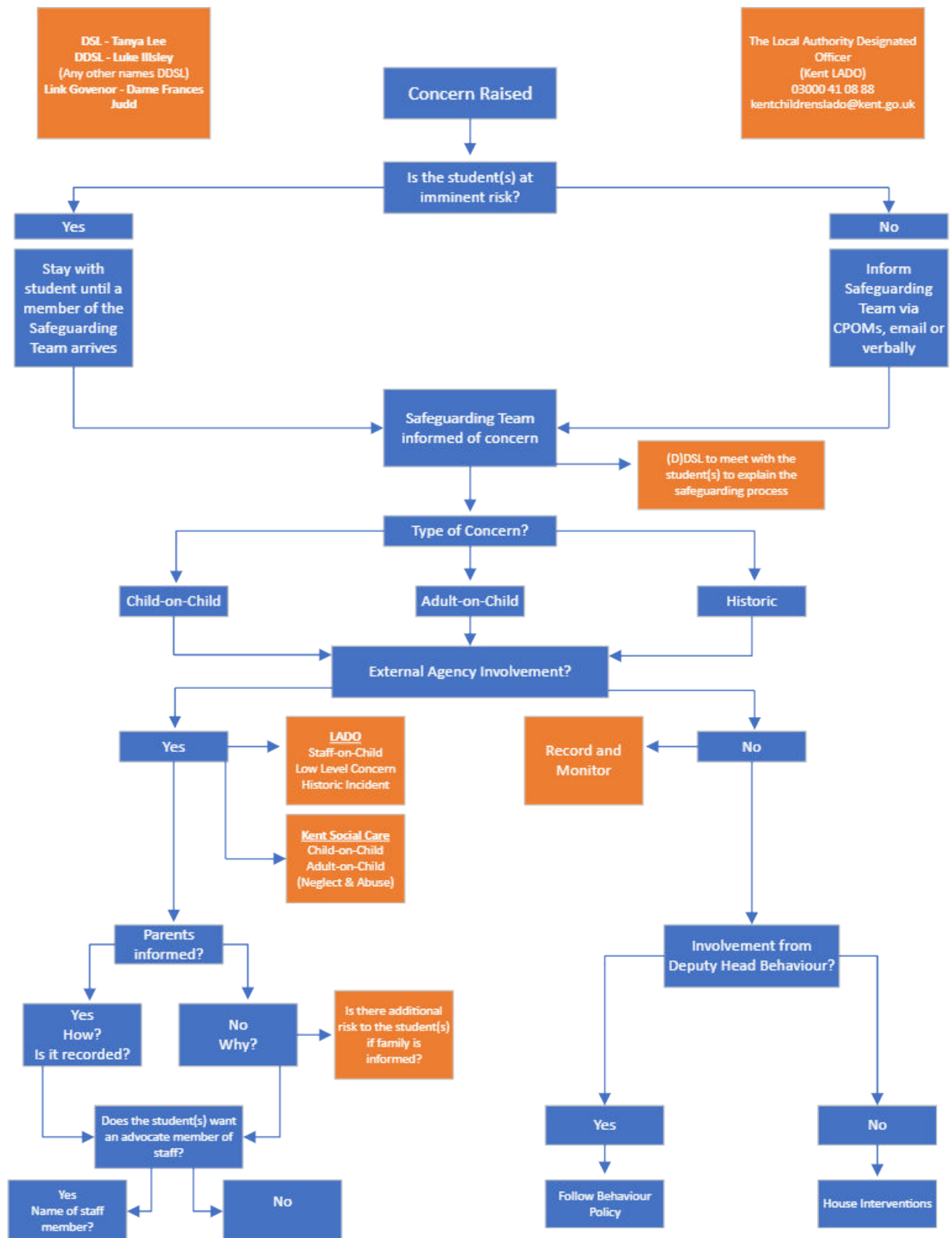
- Name of pupil
- Short summary of the issue/allegation
- The time of the statement
- Where the pupil is now

If the concern imposes an imminent threat to the student(s), ensure you stay with the student(s) and inform a member of the Safeguarding Team immediately. (Contact numbers can be found on page 15)

Phase 2: If you have not done so in phase 1 please complete an update to your CPOMS report with all details of the concern or disclosure (phase 2 is only necessary if you did not provide all details in phase 1) within 24 hours of the incident.

(if you sent an email then you need to complete the record of concern form found at Appendix 1 of this policy and separately as a Word document on the INTRANET and submit it the Pastoral Office within 24 hours of the disclosure.)

Flow Charts for Raising Concerns



Allegations of Abuse Made Against One or More Pupils

If an allegation of abuse is made against one or more pupils immediate consultation is required with the Local Area Safeguarding Advisor. **This consultation must take place prior to any form of investigation being undertaken by the school.**

There will be three possible types of investigation:

- 1) By Front Door Services and the Police under Section 47 of the Children Act 1989
- 2) By the Police under criminal law
- 3) By the School in line with its Behaviour Policy

The initial consultation with the Education Service Safeguarding Advisor will determine whether the allegation reaches the threshold of significant harm to justify a referral to Front Door Services. If the consultation discussion determines that the allegation does meet the criteria for referral to Front Door Services as a child protection concern, then the referral is made using a Child Protection Referral Form. If the consultation discussion determines that the allegation does not meet the criteria for referral to Front Door Services, but there is a concern that the child is at risk of harm then an Early Help referral will be made.

If it is deemed that the allegation does not meet the threshold for a child protection referral to Front Door Services, then it will be investigated internally by the School in line with the School's Behaviour Policy and the Policy and Procedures for Exclusion.

Allegations of abuse made against a member of staff or other adult at school

If an allegation of abuse is made against a member of staff the allegation must be passed immediately to the DSL or a member of the Safeguarding Team and consultation with the Education Service Safeguarding Advisor must take place within one working day. The Head will be kept informed by the DSL, but the consultation with the LADO or KSCMP must take place prior to any form of investigation being undertaken by the school. The school must consider carefully the possibility of abuse if a member of staff has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against or related to a child
- behaved in a way that indicates he/she is unsuitable to work with children

When a complaint of abuse is made against a member of staff on behalf of a child there should be immediate consideration of whether the child is at immediate risk and in need of protection.

When a complaint is made against a member of the boarding staff who lives within a boarding house alternative arrangements will be made for them to live elsewhere during the investigation process, and alongside this alternative arrangements will be made for staffing the relevant boarding house.

Any employee who becomes aware of a possible allegation or concern of a child protection nature must take immediate steps to ensure that the matter is reported to the Designated Safeguarding Lead, the Safeguarding Coordinator or to one of the Deputy Safeguarding Leads. It is important that the member of staff reporting the concern acts quickly and in the event that

the Deputy Head (Pastoral) and other members of the Safeguarding team are unavailable then the matter should be reported to the most senior person available at the time. An investigation may be impeded if a concern is reported late.

If the concerns are about the DSL they should be reported directly to the Head.

If the allegation concerns the Head, they must be reported immediately to the Chair of Governors without informing the Head.

The Chair of Governors is Count Benoit de Vitry D'Avaucourt (*contact details page 18*). In the absence of the Chair of Governors, the Vice-Chair is Dame Frances Judd.

There will be three possible types of investigation:

- 1) By Front Door Services and the Police under Section 47 of the Children Act 1989
- 2) By the Police under criminal law
- 3) By the School in line with staff disciplinary procedures

Any investigation would be carried out following the guidelines in "Kent Guidance for Schools and Settings" and known as KELSI, by the Children, Families and Education Directorate of Kent County Council. ([KELSI LADO services](#))

The Local Authority is responsible for managing child protection issues and any allegations against a member of staff must be reported immediately to the Local Area Safeguarding Advisor. This initial consultation will determine whether the allegation reaches the threshold of **significant harm** to justify a referral to Front Door Services. In cases of serious harm the police will be informed from the outset.

If the consultation discussion determines that the allegation does meet the criteria for referral to Front Door Services as a child protection concern, the Education Service Safeguarding Advisor will provide support to the school in making the referral and throughout the subsequent process as required. The school undertakes to report to the Disclosure and Barring Service (DBS) within one month of leaving the school any person whose services are no longer used because he or she is considered unsuitable to work with children. The school will also consider making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and where a prohibition order may be deemed appropriate.

Should it be determined in the consultation discussion that if the allegation does not meet the threshold for a child protection referral to Front Door Services, then the Education Service Safeguarding Advisor will advise on further action that may be taken by the school in investigating the matter internally in line with the staff disciplinary procedures.

Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of a LADO referral. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the staff behaviour policy, including inappropriate conduct outside

- of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being overfriendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

For more details about Low Level Concerns, please see Appendix 4.

Filtering and Monitoring

In the context of KCSIE 2023, filtering and monitoring play vital roles in keeping children safe online. As part of the school's safeguarding policy, a robust filtering system (iBoss) has been implemented to restrict access to inappropriate content and websites with potentially harmful material. This system helps create a safe digital environment where students can explore the internet securely whilst also identifying concerning online behaviour and notifying a member of staff. Additionally, the DSL and Director of IT meet regularly to discuss potential concerns and try to identify trends of concerning online behaviour so that further support or interventions can be implemented at an individual, year group or whole school level.

Whilst the filtering and monitoring system serves as an essential tool for safeguarding the school community, it is important to acknowledge that many students enjoy unlimited and unrestricted internet access through mobile phone networks. Unfortunately, the internal system (iBoss) will not be able to monitor their internet activities in such cases. To address this concern, our educational programs, delivered by both internal and external teachers, are dedicated to training students in using the internet responsibly. We aim to educate them on how to identify concerning online behaviour or materials even outside of the school internet system. We believe in empowering our students to raise concerns and seek support whenever they encounter problematic content or situations on the internet.

6. Searches

The King's School has the duty to safeguard and promote the welfare of pupils. In exercising this duty, it will pay proper attention to the National Minimum Standards and in particular to Standard 12. Sadly, there will be occasions when there is a need to search a room, belongings or a person where there is a reason to believe that the pupil has prohibited items or items which infringe the school rules or, potentially, the law of the land. For more information about searches carried out by the school and/or the police, please refer to the Searching and Confiscation policy found in the Staff Handbook.

7. Review

The Safeguarding policy is submitted annually, or following any significant changes, to the Governors and signed off by the Chair at the annual Full Board Meeting. The Governors will ensure that any faults are rectified by the DSL and the Governor responsible for Safeguarding

and Child Protection following their review.

8. The International College (IC)

The IC student population is solely comprised of international students and almost exclusively of boarders. In addition, the educational purpose of the IC is different from that of the senior school, as it focuses on academic and cultural acclimatisation to the UK. This includes one-year GCSE courses for Year 11, two-year GCSE courses for Years 10 and 11, and a one-year general preparation course for Year 9. The majority of current IC students are on a one-year programme, which intensively prepares them for entry into the Senior School or any other secondary school. IC students have lower English levels than senior school pupils, have little experience of living in the UK, and have different cultural expectations and attitudes. This makes them more vulnerable as a group. College staff have extensive experience in working with international students and are very aware of how language needs to be adapted to make communication with IC students meaningful and efficient.

College DSL: Bill Prior, Joint College Principal, 07546 512714 (school mobile)

Safeguarding Coordinator: Luke Illsley, 01227 595762 (office), 07841 235098 (mobile)

Senior School DDSL, Deputy Head: Greg Hunter, 07789 944483 (mobile)

Whole-school DSL: Tanya Lee, 01227 595560 (office), 07732 405753 (mobile)

Safeguarding concerns should be raised with Bill Prior, who is available daytime, night-time and weekends and is resident on campus. Staff and students can also raise concerns with Luke Illsley. Bill and Luke work closely over safeguarding matters. Students and staff are aware of these arrangements. On the rare occasions when Bill Prior is not on campus overnight, Greg Hunter is available and lives in a property adjacent to the campus. Contact details for the staff above are displayed on posters round the College.

IC students can be distinguished from senior school pupils through their uniform: they do not have wing collars and girls wear a dress or trousers, not a skirt. Staff use missingstudent@international.kings-school.co.uk to alert the core house team of any unexpected absences.

Student training is delivered through the PSHEC curriculum. In addition, training or information is delivered to students through regular College meetings.

Useful Contact Details

School contacts:

Designated Safeguarding Lead (DSL) Miss Tanya Lee 01227 595560 (office)
07732 405753 (mobile)

Safeguarding Coordinator Mr Luke Illsley 01227 595762 (office)
07841 235098 (mobile)

Deputy Designated Safeguarding leads (DDSLs):

Mr Matthew Thornby 01227 818553 (office)
07825 014750 (mobile)

Mr Greg Hunter 01227 595757 (office)
07789 944483 (mobile)

Sister Amanda Conlan 01227 818567 (office)
07525 387572 (mobile)

Governors

Count Benoit De Vitry D'Avaucourt, Chair of Governors b.devitrydavaucourt@kings-school.co.uk

Dame Frances Judd, Vice Chair & Safeguarding Governor f.judd@kings-school.co.uk

Kent Safeguarding contacts:

Canterbury Education Safeguarding Service 03000 418503
Brooke House, Reeves Way, Whitstable,
Kent CT5 3SS

Kent Education Safeguarding Head Office 03000 415788

Independent Safeguarding Authority (ISA) 01325 953795
PO Box 181, Darlington DL1 9FA

Integrated Front Door 03000 411111
(out of hours) 03000 419191

Early Help District Team Contacts www.kelsi.org.uk

LADO Team 03000 410888
kentchildrenslado@kent.gov.uk

Kent Police Child Abuse Investigation Unit 01622 690690

Specialised areas:

Prevent

DfE helpline for non-emergency advice
counter-extremism@education.gsi.gov.uk

020 7340 7264

Serious concerns: Police
UK anti-terrorist hotline

101

0800 789 321

Immediate threat

www.gov.uk/report-terrorism

999

FGM

FGM helpline fgmhelp@nspcc.org.uk

0800 028 3550

Appendix 1

ONLY TO BE USED IF YOU DO NOT HAVE CPOMS ACCESS

Safeguarding Record of Concern

Pupil's Details: Name House	Does the pupil know this form has been completed? <div>Yes <input type="checkbox"/></div> <div>No <input type="checkbox"/></div>
Why are you concerned about this pupil? (Please provide a description of any incidents/conversations and the dates they occurred. You must make clear what is fact and what is opinion or hearsay. You must <u>not</u> ask the pupil leading questions or try to investigate the concern yourself.)	
What have you observed and when? (This relates to anything you have personally witnessed)	
What have you been told and when? (Write here anything you have been told by the pupil or another person. Be clear about who has said what)	
What have you heard and when? (This may be third-party information that is relevant but as yet unsubstantiated)	

<p>Do the pupil's parents know this form has been completed? (Parents should not be contacted by anyone in the School if this could place the pupil at risk)</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>	
<p>Does the pupil have any visible injury or have they told you they have been injured?</p> <p style="text-align: center;"> Yes No </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> </p>	
<p>If Yes, has medical advice been sought?</p>	
<p>Date and time of this record:</p>	<p>Signature:</p>
	<p>Full name:</p>
<p>Name and position of the person this record was handed to:</p> <p>Date and time the above person received this record:</p>	

A Body Map is available for completion at Appendix 4 in case it would be useful to make a diagrammatic submission.

This form must be returned to the DSL in the Pastoral Office within 24 hours of hearing the disclosure or raising the concern.

If you have concerns about filling the form in then ask for guidance from the DSL or any of the Safeguarding Team. You should not seek guidance from other staff as that could compromise confidentiality

Appendix 2

Types of Abuse

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (eg via the internet). They may be abused by an adult or adults, or another child or children.

Child abuse can take many forms, but is usually divided into four categories:

1. Physical injury

Physical abuse is 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.

Physical indicators include:

- Unexplained bruises/welts/lacerations/abrasions:
- on face, lips, mouth or torso, back, buttocks, thighs, in various stages of healing
- clustering, forming regular patterns
- reflecting the shape of article used e.g. belt, buckle, electrical flex
- on several different surface areas
- bite marks or fingernail marks which regularly appear after absence e.g. after a weekend

Unexplained burns:

- cigar or cigarette burns, especially on soles, buttocks, palms or back
- immersion burns where hands, feet or body have been forcibly immersed in very hot water
- patterns like electrical burner, iron etc
- rope burns on arms, legs, neck or torso

Unexplained fractures:

- to skull, nose, facial structure
- in various stages of healing
- multiple or spiral fractures

Behavioural indicators include:

- flinching when approached or touched
- reluctance to change clothes for P.E. lessons
- wary of adult contacts
- difficult to comfort
- apprehension when other children cry

- crying or irritability
- frightened of parents
- afraid to go home
- rebelliousness in adolescence
- behavioural extremes – aggressiveness, withdrawal, impulsiveness
- reports injury caused by parents
- apathy
- depression
- poor peer relationships
- panics in response to pain.

2. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, and is 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; failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment. It may also include the neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical indicators of neglect include:

- consistent hunger
- inappropriate dress
- consistent lack of supervision, especially in dangerous activities for long periods
- unattended physical problems or medical needs
- abandonment

Behavioural indicators include:

- begging; stealing food
- constant fatigue, listlessness
- poor relationship with care-giver
- frequent delays in picking child up from school

3. Sexual abuse

Sexual abuse involves the 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.

Physical indicators include:

- Difficulty in walking or sitting down
- stained or bloody underclothing; pain or itching in the genital area
- bruising, bleeding, injury to external genitalia, vaginal and/or anal areas
- vaginal discharge
- bed wetting
- excessive crying
- sickness

Behavioural indicators include:

- inappropriate sexual behaviour or knowledge for the child's age
- promiscuity
- sudden changes in behaviour
- running away from home
- wary of adults
- feeling different from other children
- unusual avoidance of touch
- reporting of assault
- substance abuse e.g. glue sniffing
- emotional withdrawal through lack of trust in adults
- over compliance with requests of others
- frequent complaints of unexplained abdominal pains
- eating problems or sleeping disturbances
- poor peer relationships
- possessing money or 'gifts' that cannot be properly accounted for
- inappropriately sexually explicit drawings or stories
- enuresis or soiling, especially at the end of the school day
- frequent non-attendance at school
- avoidance of school medicals

4. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber-bullying), causing children 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, though it may occur alone.

Physical indicators include:

- failure to thrive
- delays in physical development or progress

Behavioural indicators include:

- sucking, biting, rocking
- anti-social, destructive behaviour
- sleeping disorders, inhibition of play
- compliant, passive, aggressive, demanding, inappropriately adult or infant behaviour
- impairment of intellectual, emotional, social or behavioural development

In addition as noted in the main body of the policy, all staff need to be mindful of the following:

5. Child sexual exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

6. Female genital mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. From October 2015 every adult who is concerned about a child who may be at risk of FGM has an obligation to report this (see Appendix).

7. Radicalisation and the Prevent duty

- The school has a legal duty to have due regard to the need to prevent people from

being drawn into terrorism.

- The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The school is committed to providing a safe space in which children, and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- The school has adopted the Government's definitions for the purposes of compliance with the Prevent duty: **Extremism**: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas". **Radicalisation**: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism".
- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;

- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

8. Honour based Abuse:

<https://www.cps.gov.uk/legal-guidance/honour-based-violence-and-forced-marriage>

The CPS and Home Office adopt the following definition of Honour Based Abuse(HBA):

"Honour-based" abuse is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community."

There is no statutory definition of HBA.

There is no specific offence of "honour-based" crime". It is an umbrella term to encompass various offences covered by existing legislation. HBA can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

A Forced Marriage (FM) is a marriage conducted without the valid consent of one or both parties and where duress is a factor. FM is a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014. Prior to the introduction of the offence, prosecutors dealt with FM cases using existing legislation such as false imprisonment, kidnapping and offences of violence where this is a feature of the offending.

Other forms of HBA include practices performed by perpetrators on victims for cultural or socio-conventional motives which have harmful consequences. Some of these practices include (this list should not, however, be considered as complete: FGM; Breast Ironing; and dowry abuse.

Further information for CPS prosecutors can be found on the Knowledge Hub.

Breast ironing is a form of child abuse and whilst there is no specific offence it can still be prosecuted under UK law. Please refer to the CPS legal guidance on Child Abuse.

Since 2010, the CPS identifies and flags all cases of HBA and FM. It is important that these cases are identified and flagged at the beginning so that issues are identified and the case is managed properly. Therefore this guidance must also be read in conjunction with the Guidance on Identifying and Flagging HBA and FM.

9. County Lines definition and guidance can be found here:

<http://www.nationalcrimeagency.gov.uk/publications/832-county-lines-violence-exploitation-and-drug-supply-2017/file>

The main indicators are:

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery

- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly dishevelled
- Having hotel cards or keys to unknown places.

10. Serious Violence:

The Serious Violence Strategy, which was introduced by the government in 2018, identifies offences such as homicides and knife and gun crime as key factors which account for one percent of all recorded crime. The impact of serious violent crime on individuals and the community is significant. The main areas of the Serious Violence Strategy focus on:

- Tackling County Lines
- Early intervention and prevention
- Supporting communities and local partnerships
- Effective law enforcement and the criminal justice response

Under KCSIE 2023 serious violence is separated out as a specific safeguarding issue, possibly in response to the increase in knife crime. The new guidance states:

"All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs."

All staff will be made aware of these issues via whole staff training and regular newsletter updates.

Early intervention is about recognizing and responding to the indicators of potential vulnerability in the areas set out above. All staff have a responsibility to report concerns to the DSL.

As stated in Keeping Children Safe in Education 2023, the school also recognises the following concerns;

- Child abductions
- Children and the court system
- Children with family members in prison
- Cybercrime
- Homelessness
- Modern Slavery
- Forced marriage
- Child exploitation

Appendix 3

Safeguarding Team Responsibilities

Whilst all DDSLs are trained to the same level and able to manage any safeguarding incident, it is essential that all take a particular role in order to ensure that all aspects of safeguarding are managed effectively. Therefore, there is a line of responsibility as follows:

1. The Safeguarding Coordinator (working hours Monday to Friday 9am-5.30pm)
2. DSL (When the Safeguarding Coordinator is not on site 5.30pm-9am and weekends)
3. DDSLs or second DSL i/c managing caseloads in particular when the DSL/Safeguarding Coordinator is out of school are GAH/ MJT and the JKS DSL and the International College DSL as appropriate for the area of the organisation being covered.
4. All other DDSLs are responsible for areas as outlined below or can be called on to help with cases at any time

Online Safeguarding

DDSL i/c is Matthew Thornby

This role requires specific and continued training in all online matters and the holder will train to become a CEOP ambassador. This will lead to a very proactive role particularly working alongside the Life Matters, Peer Listener and tutor programmes as well as constantly reviewing how we interact with our IT provision. This DDSL will maintain and update the Online Safety policy and will sit in place of the DSL on the IT steering committee when required.

Staff training

DDSL i/c is Luke Illsley

The DDSL in this role takes responsibility for all staff safeguarding training. This DDSL will ensure that all training materials are fully updated, at least annually, in line with the latest legislation. This DDSL will deliver training both to new staff at induction and also throughout the year whenever updates are necessary. This DDSL will liaise closely with HR to ensure that all training records are up to date. This is necessarily a proactive role at all times of the year as new staff start any time.

Pupil training & Maintaining Safeguarding Records

DDSL i/c is Luke Illsley

This member of the team takes full responsibility for pupil safeguarding training. This will be delivery to the purples at the start of their time in role, and it will also be delivery to all year groups, repeatedly both as matters arise and as changes occur. This may occur through the new Wellbeing and Life Skills programme or through house or year group assemblies, or even whole school assemblies, as is appropriate at the time. This DDSL will necessarily be significantly proactive and persuasive as they would need to muscle into all kinds of other meetings to ensure that all of this training happens. Records of training are to be kept on the Safeguarding INTRANET pages. In line with current legislation, all safeguarding records are maintained appropriately and securely. This member of staff develop and maintain all safeguarding publications across the organisation as well as be the main point of contact for the sharing of safeguarding files across schools.

Health

Sister Amanda Conlan

This DDSL level supports all matters arising through medical consultations or disclosures made during Health checks of any kind.

Appendix 4

Low Level Concern Policy

1) Introduction

As stated in the School's Safeguarding and Child Protection Policy, *"the safety and well-being of all our pupils is our highest priority."* This includes ensuring adults who work with our pupils do so in a way that is in accordance with the school's ethos and policies, including the Staff Code of Conduct. This policy details what low-level concerns are, and what processes staff should follow should they be presented with any concerns of this nature.

2) Keeping Children Safe in Education September 2023

The following is taken from Keeping Children Safe in Education September 2023

407. *As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.*

408. *Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.*

3) What is a Low-Level concern?

409. *The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:*

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

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

- *being overfriendly with children;*
- *having favourites;*
- *taking photographs of children on their mobile phone;*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,*
- *using inappropriate sexualised, intimidating or offensive language.*

411. *Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.*

412. *It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of*

schools and colleges from potential false allegations or misunderstandings.

As part of its whole school approach to safeguarding, the school will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

1) **Allegation vs Low Level Concern vs Appropriate Conduct**

Allegation
Behaviour which indicates that an adult who works with children has: 1) Behaved in a way that has harmed a child, or may have harmed a child; 2) Possibly committed a criminal offence against or related to a child; 3) Behaved towards a child or children in a way that indicated they may pose a risk of harm to children.

Low-Level Concern
Any concern – no matter how small, even if no more than a “nagging doubt” - that an adult may have acted in a manner which: 1) Is not consistent with an organisation’s Code of Conduct, and/or 2) Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct
Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

2) **Reporting, Recording and Storing of Low-Level Concerns**

If any member The School believes a fellow colleague has acted in a way that would be considered as a low-level concern, they must inform The Safeguarding Coordinator or the Designated Safeguarding Lead (DSL) immediately.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Designated Safeguarding Lead and the Safeguarding Coordinator. The school’s safeguarding system, CPOMS, does not have a category for staff concerns so reporting any concern about a member of staff must come to the DSL or Safeguarding Coordinator by other means. Using CPOMS may alert additional staff to this type of concern which could be damaging to the staff member in question.

The low-level concern and follow-up information will be stored securely within the school’s safeguarding system in which the Safeguarding Coordinator and DSL will have access to.

The Safeguarding Coordinator or DSL will liaise with the Kent Local Authority Designated Officer (LADO) should further advice be sought when dealing with low-level concerns.

3) **Key Reference Document**

Read this document for further information about Low-Level Concerns.

[low-level-concerns-guidance-2021.pdf \(farrer.co.uk\)](#)

Appendix 5

Body Map for completion if not using CPOMS to report

