THE
KING'S SCHOOL
CANTERBURY
JUNIOR KING'S

Safeguarding and Child Protection Policy

The policy is applicable across the whole school, including EYFS

Responsible Person: The Designated Safeguarding Lead

Latest Review Completed: September 2026

Junior King's

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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 themself 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.

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1 Child focused approach to safeguarding

1.1 Introduction

Junior King's School (hereafter referred to as "The School") recognise our 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) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.

The School believe that the best interests of children always come first. All children (defined in law and in this policy 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 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. All safeguarding decisions will be guided by an explicit consideration of the child's best interests, including their safety, wellbeing, voice, and longer-term outcomes

This policy applies where there are any child protection concerns regarding children who attend The 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 student/work placements.

The 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 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.

1.2 Policy context

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within *Keeping Children Safe in Education* (KCSIE) 2026.

This policy has been developed in accordance with the Children Act 1989 and the Children Act 2004, including the information sharing duty in section 16LA of the Children Act 2004 from 30 September 2026, 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)
- *Information Sharing Duty: statutory guidance for safeguarding organisations and their practitioners* (September 2026)
- Framework for the Assessment of Children in Need and their Families, 2000
- Kent and Medway Safeguarding Children Procedures
- The Education Act 2002
- 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)
- The National Minimum Standards for Boarding Schools

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 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.

This policy follows the template provided by Kent County Council

The School recognises that KCSIE 2026 strengthens expectations around:

- all staff, including staff who do not work directly with children, reading Part one in full
- community-based early help and targeted Family Help arrangements
- child-on-child abuse, including harassment, violence and support for all affected children
- modern slavery, financial exploitation, extra-familial harm, mental health and serious violence
- children who are young carers, have medical conditions, have SEND, are LGBT or gender-questioning, or may otherwise face additional barriers
- attendance as a safeguarding issue and Virtual School Head involvement where relevant
- safe and effective use of generative AI, including manipulated content and associated safeguarding and data risks

- annual review and recording of filtering and monitoring checks
- safer recruitment, regulated activity and safeguarding arrangements for premises and activities
- timely, lawful and proportionate information sharing and multi-agency working

The School will ensure that all safeguarding arrangements remain compliant with the most recent statutory guidance and that staff receive updated training to reflect changes in KCSIE 2026.

1.3 Definition of safeguarding

In line with 'Working Together to Safeguard Children' 2024 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
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- 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.

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
- Child-to-parent or child-to-carer 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’)

1.4 Related safeguarding policies

This policy should be read in conjunction with other policies such that can found in the staff handbook or on Itrent and on the school intranet. Other policies will include will provide further guidance on specific areas of the school such as pupil and staff behaviour, low-level concerns, health and safety, and self-harm.

1.5 Policy compliance, monitoring and review

This policy reflects current statutory safeguarding guidance, including Keeping Children Safe in Education 2026. The policy will be reviewed annually, and earlier where significant safeguarding updates or emerging risks require revision. 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 have access to this policy. This policy can be found in the staff handbook, school intranet, Itrent or Common Room.

Parents/carers/guardians can obtain a copy of the school’s Safeguarding and Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: www.kings-school.co.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 Head will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

2 Key Responsibilities

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 guidance and will ensure our policies, procedures and training is effective and always complies with the law.

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 are aware of their 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.

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 Head 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 management 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.

Safeguarding Culture and Assurance (KCSIE 2026)
In line with KCSIE 2026, the governing body recognises that safeguarding is not solely about compliance, but about maintaining a proactive and vigilant safeguarding culture.
The governing body will:

- Ensure safeguarding is regularly reviewed as part of strategic oversight.
- Seek assurance that safeguarding systems are effective in practice, not just on paper.
- Review data relating to attendance, exclusions, behaviour, child-on-child abuse, and online safety as safeguarding indicators.
- Ensure there are clear escalation pathways where safeguarding systems are not functioning effectively.
- Ensure that safeguarding training reflects emerging risks including AI-enabled abuse, online exploitation and coercive control.

The governing body understands that safeguarding is everyone's responsibility and will promote an open culture where concerns can be raised without fear.
From 30 September 2026, the governing body will seek assurance that the School has effective arrangements to comply with section 16LA of the Children Act 2004. This includes clear decision-making and escalation routes, secure recording, appropriate staff training, and local information-sharing protocols or agreements with safeguarding partners. Compliance will be reviewed as part of safeguarding assurance and data protection oversight.

2.2 Designated Safeguarding Lead (DSL)

The School has appointed Adam Pape (Deputy Head Pastoral), a member of the senior management team, to act as our Designated Safeguarding Lead (DSL).
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.
The School has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence:

- Liz Hutchings – Head of Boarding
- Angela Adams – Senior Nurse
- Camilla Webster – Head of Pre-Prep and Early Years
- Jessica Cooke – Year 4 Teacher

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

The DSL (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.

It is the role of the DSL to carry out their functions as identified in Annex B of KCSIE 2026. 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 must 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 and WTSC.
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, 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's 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 all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Liaising with the Head 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).

In accordance with KCSIE 2026, the DSL will also:

- Ensure that safeguarding is embedded across the curriculum, including online safety, consent, healthy relationships, exploitation and extremism.
- Oversee attendance as a safeguarding priority, identifying patterns that may indicate vulnerability or exploitation.
- Provide oversight of low-level concerns to identify patterns of behaviour.
- Work with IT leads and senior leadership to ensure filtering and monitoring systems are effective, proportionate, and regularly reviewed.
- Ensure staff understand risks associated with generative AI, deepfakes, image manipulation and AI-assisted abuse.
- Ensure that children who are victims of child-on-child abuse are supported without being disadvantaged in their education.

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 DSL's knowledge and skills will be updated regularly and at appropriate intervals, and at least annually, in order to keep up with developments relevant to their role.

Tanya Lee (Deputy Head, Pastoral of The King's School) is the Safeguarding Adviser for the King's organisation. The Safeguarding Adviser works to ensure there is a joined-up approach to safeguarding across all sites of the organisation.

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 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.
- 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 Heads) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Staff at the 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 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 Employee Code 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 to the relevant school policies and procedures.
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm, including online.
- Seek help and support from the school or other agencies.

Parental behaviors can indicate child abuse, neglect or exploitation; 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.

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.

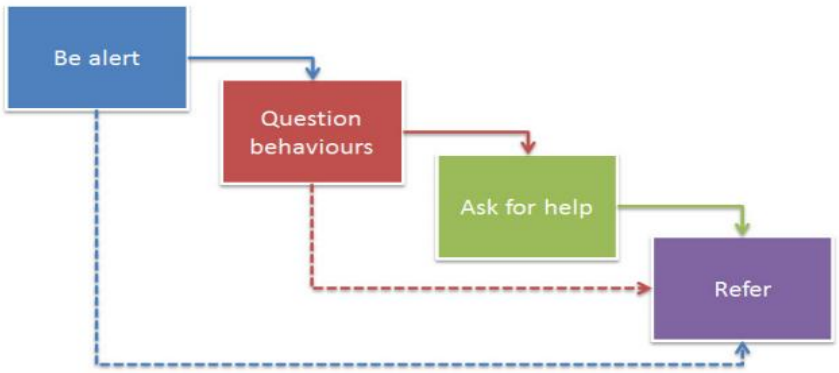
All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. This is outlined locally within the Kent Support Levels Guidance.

The School recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:

- 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 the below approach if they are concerned about a child:



The 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 harmed, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

The 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.

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

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 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 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's behaviour policy and/or 'Searching and Confiscation' policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

- The Head and 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 Head or 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.

3.2 Responding to child protection concerns

If staff are concerned about the safety or welfare of a child, they are expected to:

- listen carefully to the 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.
- inform the DSL (or deputy), as soon as 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.

KCSIE 2026 distinguishes community-based early help from targeted Family Help. References in this policy to early help include support available through universal and community services; where needs require coordinated targeted support, the School will work within local Family Help arrangements and contribute to assessment, planning and review as required.

The School will respond to safeguarding 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

In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS) and are accessed via the 'Front Door Service'(Kent Children's Services Portal).

Community-based early help is support for children and families available through universal and community services as soon as problems emerge. Targeted Family Help is coordinated multi-agency support for families with additional or complex needs. Both forms of help aim to improve resilience and outcomes and prevent concerns from escalating. The School will follow current Kent arrangements and terminology as these are implemented locally.

- 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), 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 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 before deciding next steps.

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 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.
- In these circumstances, any action taken by staff will be shared with a DSL as soon as 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 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 school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the 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, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system (CPOMS) and passed without delay to the DSL. All safeguarding decisions will be guided by an explicit consideration of the child's best interests, including their safety, wellbeing, voice, and longer-term outcomes

Staff, visitors, contractors, and volunteers who do not have access to CPOMS should exhaust the list below to ensure the concern is passed on and recorded.

- Use the safeguarding email address (safeguarding@junior-kings.co.uk)
- Record the concern together with a member of staff who has access to CPOMS
- Call a member of the safeguarding team and discuss the concern in person.

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 a 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), will be made aware of relevant information as required.

> Where a 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, and if so, if the files have been sent.

3.4 Multi-agency working

The 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 'Working Together to Safeguard Children'.

The School's 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 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 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 Head 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/college 'Searching and Confiscation' policy and/or behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

3.5 Confidentiality and information sharing

The School recognises its powers and duties to hold, use and share relevant information for safeguarding and promoting children's welfare at the earliest appropriate opportunity. From 30 September 2026, the School will comply with the information sharing duty under section 16LA of the Children Act 2004 and have regard to the associated statutory guidance. The duty applies where a person or organisation within its scope holds information about a child, or information about another individual that relates to the child, and considers that information relevant to safeguarding or promoting the child's welfare.

- Where information is relevant to safeguarding or promoting a child's welfare, staff and the School must share it with an appropriate person or organisation unless sharing would be likely to cause detriment to the child and that detriment would outweigh the benefit of sharing.
- Professional judgement will be used to decide what is relevant, necessary and proportionate. Relevant information may include information about parents, carers, family members or other people connected to the child where it relates to the child's safeguarding or welfare.
- Consent is not required where there is another lawful basis for sharing. Staff should be open with children and families where safe and appropriate, but must not seek consent or give advance notice if doing so could place a child at risk, prejudice an investigation or delay necessary action.
- Information will be shared securely, accurately, promptly and only to the extent needed. The School will record what was shared, with whom, when, for what safeguarding or welfare purpose, the lawful basis relied upon, and the reasons for the decision, including any decision not to share.
- If staff are uncertain, they will consult the DSL or DPO without delaying urgent safeguarding action. Disagreement or uncertainty will be escalated through safeguarding procedures and will not prevent necessary sharing.
- The DSL and DPO will support local information-sharing agreements and protocols, including strategic and operational arrangements with safeguarding partners. The absence of an agreement will not prevent lawful and necessary information sharing.

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 and/or guardians, unless doing so would put a child at risk of harm.

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 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.
- **Esther Marsh, Compliance Officer (e.marsh@kings-school.co.uk)**
- 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.

The Head 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. 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.

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 and members of staff and visitors who wish to report concerns or complaints. This can be found on the school website/ staff handbook.

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 in education can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: 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.

The leadership team the 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 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 A of KCSIE 2026, 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 Bruising in non-mobile children

Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.
If our setting is concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the 'Kent and Medway Protocol for the Management of Actual or Suspected Bruising in Infants and Children who are not Independently Mobile' procedures (2.2.8 of the KSCMP procedures). In summary, these procedures state:

- If a child appears seriously ill or injured, emergency treatment should be sought through an emergency department (ED) and the Kent ICS should be notified of the concern and the child's location.
- In all other cases:
- Staff must inform the DSL immediately and describe and document accurately on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
- Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.
- If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to Kent ICS, who have responsibility for arranging further multi-agency assessments.
- If there are concerns regarding the immediate safety of the child or staff, the police will be called.
- If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the Front Door Service.

4.2 Child-on-child abuse

All members of staff at the 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.

The 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
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- 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

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five).

The 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 some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

The 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 School will:

- Implement a robust anti-bullying and behaviour policy
- Provide age-appropriate Life Matters curriculum
- Train staff to recognise, report, and appropriately challenge unacceptable behaviour
- Provide a range of reporting mechanisms such as the online reporting system and the safeguarding email address

The 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.

Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers/guardians. 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.

Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:

- Taking reports seriously
- Listening carefully
- Avoiding victim blaming
- Providing appropriate pastoral support
- Working with parents/carers/guardians
- Reviewing educational approaches
- Following procedures as identified in other policies

4.3 Child-on-child sexual violence and sexual harassment

When responding to concerns relating to child-on-child sexual violence or harassment, the School will follow the guidance outlined in Part five of KCSIE.

The School recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' The 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 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, online safety.

The 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 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 and relevant local/national guidance and support, for example KSCMP procedures.
- 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, and 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 school and where necessary will be referred to Integrated Children's Services (Early Help and/or Children's Social Work Service) via the Children's Portal 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 Behaviour 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 students, or school staff.
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers/guardians 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/guardian will put a child at additional risk. Any information shared with parents/carers/guardians 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 if a request for support is appropriate, advice may be sought from the Front Door Service.

4.4 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 eighteen. 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; it should be read and understood by all DSLs working with all age groups

The School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (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 to 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 imagery, this will be immediately reported to the DSL.
- not to delete the imagery or ask the child to delete it.
- to avoid saying or doing anything to blame or shame any children involved.
- to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
- not to investigate or ask the child(ren) involved to disclose information regarding the imagery
- to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; 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.
- Parents/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).

    - 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 thirteen, 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.
- 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 if a request for support is appropriate, advice may be sought from the Front Door Service.

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

The 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, in 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 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 (CSE).

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

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.

4.6 Serious violence

All staff are 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.

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.

4.7 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 and responded to in line with this policy.

4.8 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.

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

Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, 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 are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Children's Services should be informed as appropriate.

4.9 Preventing radicalisation

The School recognises that children may be susceptible to radicalisation into terrorism.

The 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.

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 in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.

4.10 Cybercrime

The School recognises that children with particular skills and interests 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.

The DSL may also seek advice from Kent Police and/or the Front Door Service

4.11 Domestic abuse

The 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.
- 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.

- domestic abuse can take place within different types of relationships, including ex-partners and family members.
- 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.

If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

The 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 will be made if there are any concerns about a child's welfare.
- Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

4.12 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. The School recognises that behaviour may be a manifestation of unmet wellbeing or safeguarding needs, and responses will prioritise support and understanding alongside appropriate boundaries.

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.

4.13 Emerging Technologies and AI-Enabled Harm

The School recognises that KCSIE 2026 highlights increased risks associated with generative artificial intelligence and emerging technologies. The School recognises risks associated with AI-enabled harm, including manipulated imagery, exploitation, and coercion. These are addressed in detail in *Appendix 3: AI Safeguarding Addendum*.

The School will:

- Educate pupils about the risks of AI-enabled harm.
- Treat AI-generated sexual content involving children as a safeguarding matter.
- AI-related incidents will be managed in line with safeguarding procedures and as outlined in Appendix 3.
- Ensure staff are trained to recognise and respond to these emerging risks.

5 Supporting Children Potentially at Greater Risk of Harm

Whilst **all** children should be protected, The School acknowledge that some groups of children are potentially at greater risk of harm.

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

The 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.

The 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 supported to communicate and ensure that their voice is heard and acted upon.

All members of staff are encouraged to appropriately explore potential indicators of abuse, neglect and 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 disproportionally 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 disproportionally 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 to plan support as required.

5.2 Children requiring mental health support

The School has an important role to play in supporting the mental health and wellbeing of our 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:

- Speak to the pupils House Team, Health Centre Team, the Deputy Head (Pastoral) or the DSL (or deputy)
- Record on CPOMS whereby the concern can be tracked by relevant staff.

Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience within the Life Matters curriculum.

5.3 Children who are absent from education

Children being absent from education, persistently absent, severely absent, or missing education is recognised by KCSIE 2026 as a potential indicator of abuse, neglect, exploitation, child criminal exploitation, child sexual exploitation, serious violence, or mental health concerns.

Attendance will therefore be treated as a safeguarding priority, not solely an educational matter.

The DSL will work closely with attendance leads to identify patterns of concern and ensure appropriate safeguarding action is taken where required.

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 Childrens 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, the school 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.

Where the school have concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our statutory duties (DfE: Children missing education and Working Together to Improve School Attendance (2024) and local policies. Local support is available via the Kent PRU, Inclusion and Attendance Service (PIAS).

5.4 Elective Home Education (EHE)

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/guardians 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)

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 School recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and a previously looked after child also potentially remains vulnerable.

The school has appointed a 'designated teacher' (Adam Pape) who works with local authorities, including the Virtual School Kent (including the virtual school Head), 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.

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 believe 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, Bisexual, or Trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, the School recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.

When supporting a trans child, the school will consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

The School recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT education is included within our Life Skills curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space that facilitates a culture where children can speak out or share any concerns.

The School will consider safeguarding, wellbeing, parental involvement, privacy, and the views of the child when supporting gender-questioning children, in line with KCSIE 2026 and any subsequent DfE guidance.

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

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The 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.

The School will ensure 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.

Further information can be found in the Online Safety policy on the school website or the staff handbook.

6.1 Policies and procedures

The Designated Safeguarding Lead (DSL) holds overall responsibility for online safety across the School. They work closely with IT staff, curriculum leads, and pastoral teams to ensure a coordinated and effective approach to keeping children safe online.

Online safety concerns are addressed in accordance with our Child Protection, Anti-Bullying, Behaviour, and Online Safety policies. Where appropriate, internal sanctions or support will be implemented. Concerns indicating significant risk will be escalated to partner agencies in line with Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures.
The School uses a broad range of technologies, including computers, tablets, digital devices, email, and cloud-based platforms. All school-owned systems must be used in accordance with the Acceptable Use Policies and are protected through filtering and monitoring systems that meet DfE standards, including tools referenced in *Plan Technology for Your School*.
Online risks are categorised using the **Four Cs**:

- **Content**: exposure to harmful or misleading material, including **mis/disinformation and conspiracy theories**;
- **Contact**: harmful interactions with others, such as grooming or cyberbullying;
- **Conduct**: behaviours such as oversharing, sending explicit content, or engaging in abuse;
- **Commerce**: risks from online scams, gambling, and financial exploitation.

The School recognises the increasing relevance of **generative artificial intelligence (AI)**. While AI can support teaching and learning, it also presents risks
To manage these risks: Staff must risk-assess and seek **written approval** from senior leaders before using AI in school; All proposed use of AI tools in school will be subject to a documented safeguarding and data protection risk assessment, approved by a member of the Senior Leadership Team in consultation with the DSL.
Staff and pupils receive guidance on the benefits and limitations of AI;

Misuse of AI will be dealt with under the relevant policies;
Where AI is suspected in the creation or sharing of **nude or semi-nude images**, the School will respond in line with **UKCIS guidance** and local safeguarding procedures.
Regular review of pupil use, filtering effectiveness, and staff training ensures that the School's approach remains robust and responsive to emerging threats.

6.2 Appropriate filtering and monitoring on school/college devices and networks

No filtering and monitoring system can be 100% effective. The School recognises this and incorporates a holistic approach to filtering and monitoring which includes a suitable IT system, education, interventions, support and behaviour management.

The 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, we will ensure that appropriate filtering and monitoring systems are in place.

When implementing appropriate filtering and monitoring, the 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.

6.2.1 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.

Adam Pape, Pastoral Deputy Head and DSL and Frances Judd, safeguarding governor, are responsible for ensuring that our school/college 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.

6.2.2 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 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 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.

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.

6.2.3 Appropriate filtering

The School uses the system Iboss to appropriately filter and monitor content.

- Iboss is blocking access to illegal content including child sexual abuse material (CSAM).
- Iboss 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.

We filter internet use on all school owned, or provided, internet enabled devices and networks. This is achieved by:

Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices and networks, and all devices using the school broadband connection.
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.
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 DSL and/or leadership team.

6.2.4 Appropriate monitoring

We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:

- Regular reports on internet usage as well as notifications if an individual is trying to access content that is blocked.

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.

If a concern is identified via our monitoring approaches:

- Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies.
- Where the concern relates to staff, it will be reported to the Head (or chair of governors if the concern relates to the Head).

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.

In line with KCSIE 2026, the governing body recognises its responsibility to ensure:

- Filtering and monitoring systems are effective, proportionate and regularly reviewed.
- Roles and responsibilities are clearly defined between DSL, IT staff and leadership.
- There is appropriate oversight of online incidents.
- Emerging online risks are reflected in policy and training.

The DSL will work with IT leads to ensure systems are not solely technical solutions but part of a wider safeguarding strategy.

6.3 Remote/Online learning

The 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 and any local/national guidance.

All communication with pupils and parents/carers/guardians will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems such as Teams.

- Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy 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.

7 Staff Engagement and Expectations

7.1 Staff awareness, induction and training

All members of staff, including those who do not work directly with children, must read Part one of the current version of *Keeping Children Safe in Education* in full. The Part one overview is a complementary quick-reference document and does not replace Part one.

- School leaders, including the DSL and governors will read KCSIE in its entirety.
- School leaders, the DSL team and staff whose roles require a more detailed safeguarding knowledge base will read Annex B of KCSIE. Other staff may be directed to relevant sections as required.
- All members of staff have signed to confirm that they have read and understood the national guidance shared with them. Records of safeguarding training and staff declarations are maintained by the School.

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 as part of induction. Training includes online safety, filtering and monitoring responsibilities, Family Help arrangements, child-on-child abuse, modern slavery and exploitation, mental health, serious violence, emerging technologies and generative AI, and lawful information sharing under section 16LA of the Children Act 2004. Training is regularly updated and reflects advice from safeguarding partners and current Kent procedures.

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.

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.

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. Safeguarding updates may be provided through staff briefings, email updates, bulletins, CPD sessions and safeguarding notices between formal training events.

The 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.

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 be assured 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.
The DSL and Head will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

The School recognises that KCSIE 2026 places continued emphasis on identifying and managing low-level concerns about staff conduct.
Low-level concerns are those which do not meet the harm threshold but may indicate behaviour that:

- is inconsistent with the staff code of conduct,
- breaches professional boundaries, or
- could create a culture that enables unsafe practice.

All low-level concerns must be reported to the Head (or Chair of Governors where appropriate), recorded, and reviewed to identify patterns of behaviour.
The School promotes a culture where concerns are shared openly and professionally.

7.2 Safer working practice

The 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 code of conduct policy.

The DSL will ensure that all staff (including contractors) and volunteers are aware of the school expectations regarding safe and professional practice via the staff 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, mobile and smart technology, Acceptable Use Policies (AUPs), 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 School is committed to ensure that we 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. We recognise that we must ensure that people working with children in our setting are suitable, have the relevant qualifications/training and have passed any required checks to fulfil their roles.

- The School will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
- The School will apply the current statutory definition of regulated activity and follow Part three of KCSIE 2026 and current DBS guidance when deciding which DBS and children's barred-list checks are required. Decisions about staff, volunteers, contractors and adults who supervise children on work experience will be role-specific, risk assessed and recorded; supervision will not be treated as automatically removing the need for appropriate checks.

- 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 School will comply with the statutory guidance on the application of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and related obligations under the Childcare Act 2006.

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

Where the school/college places a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil 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/college would otherwise perform in respect of our own staff.
The School will commit to half-termly reviews of alternative provision providers and knowledge of the placement address.

8.2 Allegations/concerns raised in relation to staff, including supply teachers, 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).

Any concerns or allegations about staff will be recorded and dealt with in line with Part four of KCSIE and local Kent allegations arrangements. 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 Head 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).

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Head (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 the situation that 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 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
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- 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 Head 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 Head, 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 School may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct and low-levels concerns policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

- The 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 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 low-level concerns policy to Adam Pape (DSL).

- Where low-level concerns are reported to the school, the Head 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 Head will share concerns and liaise with the LADO enquiries officer.
- 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 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 and following our disciplinary/HR 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 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 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.

The 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.

9 Opportunities to Teach Safeguarding

The 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 Life Skills, assemblies and specific training for pupils in positions of responsibility.

We recognise that school play 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 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 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 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.

In accordance with KCSIE 2026, safeguarding education will include:

- Consent and respectful relationships
- Online behaviour and digital resilience
- Recognising exploitation and coercion
- AI literacy and risks of manipulated content
- Healthy masculinity and gender-based abuse awareness
- How to report concerns confidently

The School recognises that prevention is central to safeguarding and that children must be equipped with the knowledge to keep themselves safe.

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 physical restraint and use of force policy and is in line with the DfE 'Use of reasonable force in schools' guidance.

10.2 The use of school 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 Head 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 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.

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 School are made aware of local support available.

- **Kent Integrated Children's Services/ Children's Social Work Services**
  - Childrens Portal (kent.gov.uk)
  - Front Door Service (Kent Children's Services Portal): 03000 411111
  - Out of Hours Number: 03000 419191

- **Local Early Help and Preventative Services and Family Hubs**
  - Early Help and Preventative Services - KELSI
  - Early Help contacts - KELSI

        - Kent Family Hubs - Kent County Council

- **Kent Police**
    - 101 or 999 if there is an immediate risk of harm

- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
    - www.kscmp.org.uk
    - 03000 421126 or kscmp@kent.gov.uk

- **Adult Safeguarding**
    - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

- **County LADO Service**
    - Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership
    - **03000 410888**
    - kentchildrenslado@kent.gov.uk

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, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing, for example for PE
- Secrecy relating to use of technology
- Sexually transmitted disease or pregnancy
- 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
- Inappropriate/harmful medication usage
- Aggressive behaviour or severe temper outbursts.
- Injuries that cannot be accounted for. Inadequate, inconsistent, or excessively plausible explanations for an injury, 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. Emotional abuse may include persistent verbal abuse, humiliation, belittling, rejection, intimidation or name-calling. 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
- Secrecy relating to use of technology
- 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 peers
- 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 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

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

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

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

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: 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/

Children with Family Members in Prison

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

Substance Misuse

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

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: https://tce.researchinpractice.org.uk/

Honour Based Abuse

- Karma Nirvana: https://karmanirvana.org.uk
- Forced Marriage Unit: 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
- Mandatory reporting of female genital mutilation: procedural information: 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

Radicalisation and hate

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

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

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: 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

Mental Health

- Mind: www.mind.org.uk
- Moodspark: https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Appendix 3: AI Safeguarding

Purpose

This addendum sets out how the School safeguards pupils in relation to the risks and opportunities presented by artificial intelligence (AI) and emerging technologies. It should be read alongside the Safeguarding and Child Protection Policy, Online Safety Policy, Behaviour Policy, and Acceptable Use Policies.

Definition

Artificial intelligence (AI) refers to systems capable of generating content, analysing data, or interacting with users (including generative AI tools such as chatbots, image generators, and synthetic media technologies).

Key Safeguarding Risks

The School recognises that AI introduces both new and evolving safeguarding risks, including:

- AI-generated sexual imagery, including deepfakes involving children or staff
- Synthetic child sexual abuse material (CSAM)
- Online grooming and exploitation using AI chatbots
- Bullying, coercion, or blackmail using manipulated images or audio
- Impersonation, identity abuse, and fraud
- Rapid spread of harmful or misleading content (misinformation/disinformation)
- Reduced barriers to harmful behaviour (e.g. generating abusive content)
- Cognitive offloading, where over-reliance on AI tools reduces a child's critical thinking, judgement, independence, or ability to assess risk

The School recognises that cognitive offloading may impact safeguarding by:

- reducing children's ability to evaluate harmful or manipulative content
- increasing vulnerability to exploitation, coercion, and misinformation
- diminishing resilience, decision-making skills, and help-seeking behaviour

All such risks are treated as safeguarding concerns, not solely behaviour or academic integrity issues.

School Responsibilities

1. Safeguarding Response

- Treat AI-related harm in line with child protection procedures and KCSIE
- Respond to incidents using the same principles as child-on-child abuse
- Involve the DSL immediately where there is risk of harm
- Refer to external agencies (e.g. police, children's services, CEOP) where appropriate

2. Prevention and Education

- Teach pupils:
    - how AI systems work (age-appropriate)
    - how to identify manipulated or unreliable content
    - how to critically evaluate AI outputs rather than rely on them uncritically
    - how to maintain independence of thought and decision-making
    - how to report concerns confidently
- Address cognitive offloading by promoting:
    - critical thinking and digital resilience
    - safe scepticism and verification of information
- Embed AI awareness within RSHE, online safety, and pastoral education

3. Staff Training

All staff will receive training on:

- identifying AI-enabled harm (including deepfakes and synthetic content)
- understanding the safeguarding implications of cognitive offloading
- responding to disclosures involving AI
- recognising how reliance on AI may mask vulnerability or risk

4. Safe Use of AI in School

- AI tools must only be used where:
    - risks have been assessed
    - use is educationally appropriate and proportionate
- All AI use must be approved by Senior Leadership in consultation with the DSL where safeguarding or data risk is present
- Staff must not:
    - input personal pupil data into unapproved systems
    - encourage passive or uncritical reliance on AI tools

5. Data Protection

- AI use must comply with:
    - UK GDPR
    - Data Protection Act 2018

- No pupil data will be processed by AI tools without:
    - approval from the School's Data Protection Officer (DPO)
    - appropriate safeguards in place

6. Filtering and Monitoring

- The School will ensure filtering and monitoring systems:
    - account for AI-enabled risks
    - are regularly reviewed and updated
- Monitoring alerts linked to AI misuse will be treated as safeguarding concerns

7. Reporting and Recording

- All AI-related safeguarding concerns will:
    - be recorded on CPOMS
    - include context (e.g. tool used, nature of content, level of reliance, impact)
- Patterns of behaviour, including over-dependence on AI, will be reviewed as part of safeguarding oversight

Child-Centred Approach

The School recognises that children may:

- not fully understand the risks of AI
- become over-reliant on AI without recognising the implications
- be victims without recognising harm
- experience embarrassment, fear, or coercion

All responses will:

- prioritise the child's safety, wellbeing, independence, and best interests
- avoid victim-blaming
- support the development of resilience, judgement, and autonomy

Governance and Review

- The DSL and Senior Leadership Team will:
    - review AI-related safeguarding risks (including cognitive offloading) at least annually
    - update staff training accordingly
- The safeguarding governor will maintain oversight of:
    - emerging risks

- effectiveness of school responses

Links to Other Policies

This addendum should be read alongside:

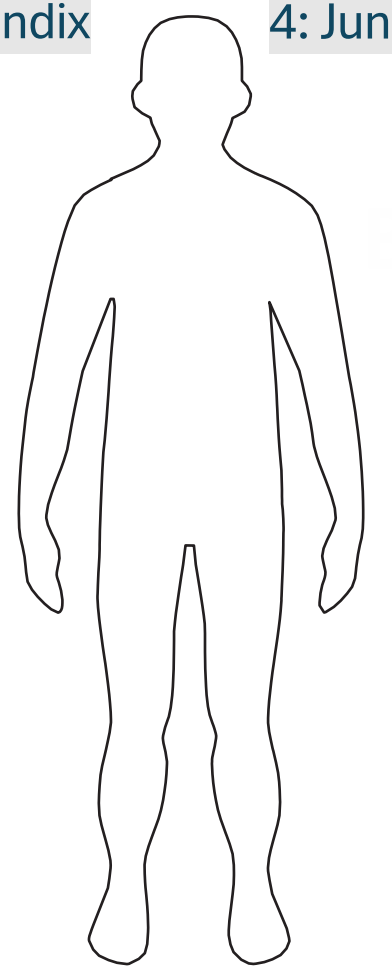
- Safeguarding and Child Protection Policy
- Online Safety Policy
- Behaviour Policy
- Acceptable Use Policy
- Data Protection Policy

Key Principle

AI does not change safeguarding responsibilities.
It amplifies risk, complexity, and dependency, requiring greater vigilance, critical thinking, and active safeguarding practice.

THE
KING'S SCHOOL
CANTERBURY
JUNIOR KING'S

Appendix 4: Junior King's Body Map



Body Map for completion if not using CPOMS to report

Caution: Staff must not view any part of the body that is normally covered up, to view or substantiate an injury. In this case staff must accept the child's word and indicate the area on the body map.