



CHILD PROTECTION AND SAFEGUARDING POLICY

Statement

The Board of Trustees and staff of Tonbridge Grammar School take seriously our responsibility to safeguard and promote the welfare of all the children and young people entrusted to our care.

We have carefully considered and analysed the impact of this policy on equality and the possible implications for students with protected characteristics. This forms part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

 Kent Safeguarding Children
multi-agency partnership



Child Protection and Safeguarding Policy

Approved: Sept 2024

Review: annually

Approval: Board of Trustees

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Review: annually

Approval level: Board of Trustees

Safeguarding Contacts 2025-26



Key Contacts	Telephone No.
Designated Safeguarding Lead (DSL): Miss Bishop (Y10-11)	Ext 229
Safeguarding Officer: Miss Darby	Ext 277
Deputy DSLs: Mrs Ghali (Y7-9) Mr Barker (Y12-13)	Ext 252 Ext 226
Mr Jardine-Viner Mr Fitt (Strategy)	Ext 265 Ext 264
Student Support Co-ordinators: Miss Hart (Y7) Mrs Dann (Y8)	Ext 236 Ext 273
Mrs Allison (Y9) Miss Pragassen (Y10)	Ext 250 Ext 251
Mrs Theoharis (Y11) Mrs Hutton (Sixth Form)	Ext 256 Ext 240
Named Child Protection Governor: Mrs Merritt	Contact via the school office
 <p>The County LADO service and Education Safeguarding Service merged in September 2024. This aligns both services with the national 'Working Together to Safeguard Children' agenda. The service provides support to Kent education settings and the wider Children's workforce.</p> <p>If your concern relates to the welfare of a child</p> <p>If you need to make a referral to the LADO regarding an allegation against a member of staff</p> <p>If you need clarification on whether to make a LADO referral, need general education safeguarding or online safety advice</p>	<p>→ Contact the Front Door Service via the Kent Integrated Children's Services Portal.</p> <p>→ Complete a LADO referral via the Kent Integrated Children's Services Portal.</p> <p>→ Use the LESAS enquiry form.</p>
NSPCC helpline	0800 028 0285 8:00 AM to 8:00 PM, Mon-Fri Email: help@nspcc.org.uk .

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What to do if you have a welfare concern in Tonbridge Grammar School

Why are you concerned?

For example

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include frequent or unexplained injuries/marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning, harmful or inappropriate behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the School procedure

- Reassure the child
- Clarify concerns using open questions if necessary (TED: Tell, Explain, Describe)
- Use child's own words and record facts, not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead (See details of DSLs on p2 of CP Policy)

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent [Request for Support to the Front Door Service via the portal](#) or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with [Kent Safeguarding Support Level Guidance and KSCMP procedures](#), as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the [Front Door Service Portal](#).
- If the school believes a child may be in need of support but are unclear whether to refer, a [no-named consultation](#) can be sought from the Front Door Service via **03000 411 111**
- If support is required out of working hours, the [school/college](#) will contact the Out of Hours Service

If you are unhappy with the response

Staff:

- Follow local authority/safeguarding partnership escalation procedures
- Follow TGS whistleblowing procedures

Students or Parents:

- Follow school complaints procedures (details on the School website)

Record decision making and action taken in the student child protection file

Monitor

Be clear about:

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

Review and request further support if necessary

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

*Staff must record any safeguarding concern that they have about a child on MyConcern. The record must be completed as soon as possible after the incident.

1. Introduction: A Child Focused Approach to Safeguarding

Tonbridge Grammar School recognises the statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and all members of our community (staff, volunteers, trustees, leaders, parents/carers, wider family networks and students) have an important role in safeguarding children and have an essential role to play in making our community safe and secure.

We believe that the best interests of children always come first. All children (defined in law in this policy as those up to the age of 18) have a right to be heard and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.

Staff working with children at TGS are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

This policy applies where there are any child protection concerns regarding children who attend the 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.

Tonbridge Grammar School recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

We recognise the importance of adopting a trauma informed approach to safeguarding, considering the root causes and possible underlying trauma behind children's behaviour.

Our core safeguarding principles are:

- **Prevention:** positive, supportive, safe school 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 students, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
- **Collaboration:** with both parents where possible and other agencies (to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise).

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2025.

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2. Definition of Safeguarding

In line with 'Working Together to Safeguard Children' and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- a. providing help and support to meet the needs of children as soon as problems emerge
- b. protecting children from maltreatment, whether that is within or outside the home, including online
- c. preventing impairment of children's mental and physical health or development
- d. ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- e. 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)
- f. 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.

In line with KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment
- 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, and
- taking action to enable all children to have the best outcomes.

The School acknowledges that safeguarding includes a wide range of specific safeguarding issues including (but not limited to):

- Abuse and neglect
- Bullying (including cyberbullying and prejudiced based bullying)
- Child-on-child abuse
- Children with family members in prison
- Children who are absent or Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation
- Contextual Safeguarding (Risks outside the family home)
- County Lines and gangs
- Domestic violence
- Drugs and alcohol misuse and substance abuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults
- Nude or semi-nude image sharing, also known as youth produced/involved sexual imagery or "Sexting"

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- Online safety
- Peer on peer abuse
- Poor parenting, particularly in relation to babies and children
- Preventing radicalisation and extremism
- Private fostering
- Racist, disability, homophobic, biphobic or transphobic abuse
- Relationship abuse including teenage relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- Upskirting

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

"Contextual Safeguarding" ensures that a wider picture is built around the child. Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.

This policy will be reviewed at least annually (as a minimum) and will be updated as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

The Designated Safeguarding Lead (DSL), Deputy Head Teacher (Wellbeing) and Head Teacher will ensure regular reporting on safeguarding activity and systems in school to the Board of Trustees. The Board of Trustees will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

This policy applies to all staff (including temporary or third-party agency staff and volunteers) and trustees and is consistent with statutory guidance outlined in 'Keeping Children Safe in Education' (KCSIE). The School adheres to the procedures of the Kent Safeguarding Children Multiagency Partnership (KSCMP). Because of our close day to day contact with children, all staff have a crucial role to play in helping identify welfare concerns and indicators of possible abuse and neglect at an early stage.

3. Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:

- DfE guidance: KCSIE
- Working Together to Safeguard Children (WTSC)
- Ofsted: Education Inspection Framework'
- Framework for the Assessment of Children in Need and their Families
- [Kent and Medway Safeguarding Children Procedures](#)
- The Children and Families Act 2014
- The Education Act 2002
- Education and Inspections Act 2006
- The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)
- "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - [Safer Recruitment Consortium](#)
- [What to do if you are worried a child is being abused](#)

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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 students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

We 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.

As a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services (such as health and the local authority) to ensure necessary support is in place.

4. Key Responsibilities

The Board of Trustees and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

The Board of Trustees have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

The Board of Trustees 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 Board of Trustees 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](#)).

The Board of Trustees 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 School has a nominated trustee for safeguarding. The nominated trustee 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.

The Board of Trustees, Head Teacher and Leadership Team will ensure that the DSL is properly 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 Head Teacher will ensure that our child protection and safeguarding policies and procedures adopted by the Board of Trustees, are understood, and followed by all staff.

Designated Safeguarding Lead (DSL)

The School has appointed a member of the leadership team to act as our Designated Safeguarding Lead (DSL) who works within a wider team of Deputy DSLs from the Leadership Team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school (including online safety and understanding the filtering and monitoring systems and processes in place).

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The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and any deputy DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

Deputy DSLs are trained to the same standard as the DSL and will act in the DSL's absence. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The Head Teacher will be kept informed of any significant issues by the DSL.

The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and children regarding any new safeguarding and welfare concerns following Covid-19. This may include handling of referrals to integrated social care and working with other agencies where appropriate.

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 C of KCSE. 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
 - In the case of children with a social worker or Looked After Children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaising with other agencies and professionals in line with KCSIE and Working Together to Safeguard Children (WTSC) 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners [Kent Safeguarding Children Multi-Agency Partnership](#) (KSCMP), including referrals, are followed, as necessary.
- Representing, or ensure the School is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Managing and monitoring the School'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 to 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.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Liaising with the Head Teacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).

The DSL is supported by the Safeguarding Officer but has the overall responsibility for safeguarding and child protection.

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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 alert to any issues of concern in a child's life at home or elsewhere.
- 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.
- to understand the early help process and their role in it.
- to understand the School's safeguarding policies and systems.
- to undertake and engage in 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 our staff code of conduct.
- act in line with the Teachers' Standards which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Staff 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 will determine how best to build trusted relationships with children and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff code of conduct and student behaviour policies.

Children and Young People

Children 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

Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere the relevant school/policies and procedures.
- Talk to their children about safeguarding issues with their children & support the School in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the School, or other agencies.

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5. Recognition and Types 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 (2018) and Keeping Children Safe in Education. This is outlined locally within the [Kent Support Levels Guidance](#).

It is recognised that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse: (for further information see Appendix 1)

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Members of staff are aware that child welfare 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.

It is recognised that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

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

Children may report abuse, 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 outside 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.

Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse or exploitation online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

It is recognised that some children have additional or complex needs and may require access to intensive or specialist services to support them.

Staff need to remember that child abuse can occur within all social groups regardless of religion, culture, social class or financial position. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying-without outwardly showing any signs; and

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- communication challenges with respect to making their concerns clearly understood. It is also important to remember that those who abuse children can be of any age, gender, ethnic group or background and it is important not to allow personal preconceptions to prevent recognition or action taking place. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

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 'Searching and Confiscation' policy which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a student was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the student who has been searched to assess the incident against any potential wider safeguarding concerns.

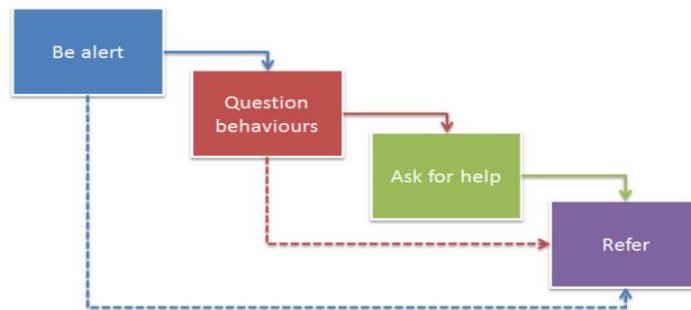
Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

6. Safeguarding and Child Protection Procedures

Tonbridge Grammar School adheres to the KSCMP Safeguarding Children Procedures. The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the KSCMP website www.kscb.org.uk. Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found at www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services.

Tonbridge Grammar School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

- All members of staff are expected to be aware of and follow the '[What to do if you are worried a child is being abused](#)' guidance if they are concerned about a child:



If staff are made aware of a child protection concern, they are expected to:

- listen carefully to the concern, 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, e.g. 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 on MyConcern using the facts as the child presents them.
- inform the DSL (or deputy), as soon as practically possible.

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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. Staff should speak to the Safeguarding Officer, request a consultation with a social worker from the Front Door, or make a request for support to the Front Door Service themselves. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

We 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](#).

'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.

If early help support is appropriate, the DSL (or a deputy) with support from the safeguarding office, 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 Integrated Children's Services (via the [portal](#)) and/or the police, in line with [Kent Support Level Guidance and KSCMP procedures](#).

It is recognised 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. If they believe a child may be in need of support but are unclear whether a Request for Support should be submitted, 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 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.

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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 or Safeguarding Officer in line with guidance provided by KSCMP and ICS. Parents/carers will be informed in the case of a request for support being submitted, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would 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, the Safeguarding Officer 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.

7. Record Keeping

All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded on MyConcern. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

Records will be completed as soon as possible after the incident/event, using the child's words. Records will record facts and not personal opinions. A body map will be completed if injuries to a child have been observed.

If there is an immediate safeguarding concern the member of staff will consult with a DSL before making a referral on MyConcern 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 a note of any action taken or not taken, decisions reached and the outcome.

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

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover as soon as possible after enrollment at their new school (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). These will be transferred securely to the new DSL and a receipt of delivery 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-ordinator (SENCO) will be made aware of relevant information as required.

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

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8. 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 to provide a coordinated response to promote children's welfare and protect them from harm as identified in 'Working together to Safeguard Children'. This includes contributing to KSCMP processes as required. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with local and national guidance.

Some examples of multi-agency relationships may include, social workers, early help workers, health professionals (such as pediatricians, health visitors, mental health services and speech and language therapists), specialist teachers, education psychologists, other schools/settings where children attend more than one setting/provision and police.

The School recognises the importance of multi-agency working and will support attendance at relevant safeguarding 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 Teacher 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 'searching and confiscation' policy and behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

9. Confidentiality and Information Sharing

The School recognises its duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE and WTSC.

The School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements.

All staff are made aware of the need to protect the privacy of the children in their care, as well the legal requirements that exist to ensure that information relating to the child is handled in a way that ensures both confidentiality and safeguarding. Staff will ensure there is an area where they may talk to parents and/or carers confidentially.

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.

Staff are made aware of their 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.

Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on schools/colleges 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.

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All staff will be provided with training and information to ensure they understand 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 Teacher, DSL and Safeguarding Officer will disclose relevant safeguarding information about a student with staff on a 'need to know' basis.

10. Complaints

The School has a **Complaints Procedure** available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found on the TGS website.

Whilst members of our community are encouraged to report concerns and complaints directly to the School, it is recognised that this may not always be possible. Children and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

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 will take all concerns and whistleblowing reports 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 18 of this policy.

11. Specific Safeguarding Concerns

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 and staff who work directly with children will read annex B of KCSIE 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 6 of this policy and speak with the DSL or a deputy.

Child-on Child Abuse (formerly referred to as peer-on-peer abuse)

All members of staff at 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.

It is recognised that peer on peer abuse can take many forms, including but not limited to:

- bullying, including cyberbullying
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- 'upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- nude or semi-nude image sharing (also known as 'sexting' or youth produced/involved sexual imagery)
- initiation/hazing type violence and rituals

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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 “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and 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.

It is recognised that that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

It is recognised 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 implements a robust anti-bullying policy, provides an age-appropriate HSEE and RSE curriculum, and provides a range of reporting mechanisms through Form Tutors, Student Support Co-ordinators or directly to DSLs.

Children must 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. Students who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Concerns about students' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with students and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies. Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the School premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.

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

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

Sexual Violence or 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.’ It is recognised that 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.

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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 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 and child protection.

The School recognises that the law is in place to protect children rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them.

It is recognised 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, adult students, 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) and/or the police.

Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult 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 when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken. If DSLs are unsure how to proceed, advice will be sought from the Front Door Service.

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Nude and/or Semi-Nude Image Sharing by Children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing.

It is recognised that consensual and nonconsensual nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or "sexting") is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

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

- report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
- never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed the imagery, this will be immediately reported to the DSL.
- not delete the imagery or ask the young person to delete it.
- to avoid saying or doing anything to blame or shame any children involved.
- to reassure the child(ren) explain to child(ren) involved that they will report the issue to the DSL so that they will 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 or children involved in the incident to disclose information regarding the imagery.
- not share information about the incident with other members of staff, children or parents and/or 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: "Responding to youth produced sexual imagery"

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 and carers will be informed at an early stage and 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.
- a referral will be made to via the Children's Portal ICS 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, the age of the child or they have special educational needs).
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

If DSLs are unsure how to proceed, advice will be sought from the Front Door Service.

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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.

It is recognised 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.

Serious Violence

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

It is recognised that the likelihood of involvement in serious violence may be increased by factors such as being male, having been frequently absent or permanently excluded, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Additionally, violence can peak in the hours just before or just after school, when students are travelling to and from school and these may be particularly risky times for children involved in serious violence.

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.

Modern Slavery and the National Referral Mechanism (NRM)

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](#).

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So-called honour-based abuse

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 should be responded to in line with section 6 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/students, 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](#).

Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about risk or suspected cases of female genital mutilation (FGM), there is a specific legal 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.

It will be rare for teachers to see visual evidence, and they should not be examining pupils/students, 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.

Preventing radicalisation

It is recognised 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.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. staff will be alert to changes in children's behaviour [indicate that they may need help or protection from radicalisation](#).

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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 any 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.

Where a child is receiving support regarding concerns relating to preventing radicalisation, for example, through the 'Channel' programme, the DSL will consider if it would be appropriate to share any information if/when a child leaves to attend any new schools/colleges, so support can be put in place in place for when the child arrives. Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#).

Cybercrime

The School recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or 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 children 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 this and other appropriate policies.

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.

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

We are an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing 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 enable 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.

Mental health

All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

12. Supporting Children Potentially at Greater Risk of Harm

Safeguarding Children with Special Educational Needs or Disabilities (SEND)

The School acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse, neglect or exploitation.

Children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

All members of staff will be encouraged to appropriately explore possible indicators of abuse, neglect or exploitation, such as behaviour, mood changes or injuries and not to assume that they are related to the child's SEN or disability. Staff will be mindful that children with SEND or certain medical conditions can be disproportionately impacted by safeguarding concerns such as bullying without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

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To address these additional challenges, the 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.

Children requiring Mental Health Support

The School has an important role to play in supporting the mental health and wellbeing of our students. All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware of how children's experiences, 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. The DSL will work closely with the Safeguarding Officer and Mental Health Co-ordinator to plan support as required.

Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience. As well as the Mental Health Co-ordinators, students are supported by the Student Support Co-ordinators, the School Nurse. The School also has three wellbeing dogs.

Children who are absent from education

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

A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where possible, the School will hold more than one emergency contact number for each student, so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.

Where the School has concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

Children attending alternative provision

Where the School places a student with an alternative provision provider, it continues to be responsible for the safeguarding of that student. This includes:

- having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
- regularly reviewing (at least half termly) the alternative provision placements made to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.

Where safeguarding concerns arise, placements will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

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Elective Home Education

Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#).

We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

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.

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.

Looked after children (including kinship care), previously looked after children and care leavers

It is recognised that 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](#)' 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, including those in kinship care.

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.

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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 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.

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.

Where private fostering arrangements come to the attention of the School, for example, through the normal course of their interaction and promotion of learning activities with children, we must notify Kent Integrated Children's 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.

Children who are Lesbian, Gay, Bisexual, or Gender Questioning

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

We recognise that risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. Appropriate education is included within our Relationship and Sex Education and Health Education curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

13. Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. A whole school approach is taken to online safety which will empower, protect, and educate our students 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 reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

The School identifies that the issues can be broadly categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism; misinformation, disinformation (including fake news) and conspiracy theories.
- contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

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- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images or online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

It is recognised that technology, and the risks and harms related to it, evolve and change rapidly. The School will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.

The Head Teacher will be informed of online safety concerns by the DSL, as appropriate. The named trustee for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider Board of Trustees.

The DSL has overall responsibility for online safety but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.

The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, online safety and behaviour policies. Internal sanctions and/or support will be implemented as appropriate. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

The School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, SharePoint, Microsoft Teams and email systems. All school-owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

Generative Artificial Intelligence (AI)

It is recognised that when used safely, effectively and with the right infrastructure in place, generative artificial intelligence (AI) tools may have many uses which could benefit our school community. However, it is important to recognise that AI tools can also pose safeguarding risks to our community as well as moral, ethical and legal concerns. This is including, but not limited to:

exposure to inappropriate or harmful content, including bullying and harassment, abuse and exploitation
 privacy and data protection breaches/risks
 intellectual property infringements
 academic integrity challenges, such as plagiarism and cheating, and
 exposure to inaccurate, harmful and/or biased content.

The School only permits the use of generative AI tools which have been approved and provided for work and/or educational purposes, following the senior leadership team undertaking risk assessments and/or data protection impact assessments prior to use.

Staff and students will be made aware of the benefits and risks of using AI tools.

The School will respond to any misuse of AI in line with relevant policies, including anti-bullying, behaviour and child protection.

Where the School believe that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the School will respond in line with the UKCIS guidance '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance.

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Where it is believed that AI tools may have facilitated [deep fake](#) abuse of adults, advice and support will be provided to individuals affected, such as via Unions, [Professionals Online Safety Helpline](#) or [Report Harmful Content](#) and/or if a crime has been committed, via the [police](#). Action will be taken in line with relevant policies, including but not limited to, anti-bullying, behaviour and complaints.

KCSIE 2025 includes a link to the [DfE guidance Generative AI: product safety expectations](#) for further guidance.

Mobile and Smart Technology

Tonbridge Grammar School recognises the specific risks that can be posed by mobile phones and smart technology, including mobile/smart phones, cameras and wearable technology and any other electronic devices with imaging and/or sharing capabilities. Appropriate policies are in place that are shared and understood by all members of the School community. Further information reading the specific approaches relating to this can be found in the School's Guidance on the Acceptable Use of ICT and Mobile Phone Charter which can be found on the TGS website.

Appropriate Filtering and Monitoring

The School will do all we reasonably can to limit children's exposure to online harms through school/college provided devices, systems, platforms 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.

This includes ensuring application of appropriate filtering and monitoring to both static content, as well as dynamic and AI-generated materials, products and/or systems used.

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 and we recognise that we cannot rely on filtering and monitoring alone to safeguard our students. Effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.

Students will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment and/or a data privacy impact assessment as relevant.

Internet use will be supervised by staff as appropriate to students age, ability and potential risk of harm.

Our Board of Trustees have 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 safeguarding concerns when identified.

The DSL and Safeguarding Trustee are responsible for ensuring that our school has met the DfE [Filtering and monitoring standards](#) for schools and colleges.

Our senior leadership team is 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 service providers and IT support staff have sufficient time and support to manage their filtering and monitoring responsibilities.

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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 service providers 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, students and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

Decision making and reviewing our filtering and monitoring provision

When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT service providers. Decisions about our filtering and monitoring provision have been recorded and informed by an approach which ensures our systems meet our school's specific needs and circumstances, including but not limited to our student risk profile which considers the specific vulnerabilities (including age and ability), risk and context of our students, and our school and specific technology use.

Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, with approval from the leadership team; all changes to the filtering policy are logged and recorded.

Our school undertakes regular (at least annual) reviews of our filtering and monitoring approaches 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 systems work effectively in practice and as expected, and to provide assurance to the Trustees that we are meeting our safeguarding obligations.

These checks are achieved by termly checks are undertaken by a DSL. Checks are undertaken with two members of staff present (A DSL and IT support staff. Checks are undertaken in a location where confidentiality can be achieved, during working hours, when students are not present. Checks are logged/recorded, any technical concerns are flagged to the IT service provider and safeguarding concerns are actioned by the DSL and Safeguarding Officer in line with this policy.

Appropriate filtering

The School's education internet connectivity is provided through London Grid for Learning (LGfL) and uses their filtering system to block access to harmful content. Full details are available [here](#).

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LGfL blocks school provided internet access to illegal content and activity as identified in the Online Safety Act, including:

- Child Sexual Abuse Material (CSAM)
- Controlling or coercive behaviour
- Extreme sexual violence
- Extreme pornography
- Fraud
- Racially or religiously aggravated public order offences
- Inciting violence
- Illegal immigration and people smuggling
- Promoting or facilitating suicide
- Intimate image abuse
- Selling illegal drugs or weapons
- Sexual exploitation
- Terrorism

LGfL is a member of [Internet Watch Foundation](#) (IWF) and has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU). LGfL is blocking access to illegal content including child sexual abuse material (CSAM).

LGfL has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)

LGfL blocks school provided access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes hate speech or discrimination, gambling, harmful bullying content, drugs/substance misuse, malware/hacking, [mis-disinformation](#), piracy and copyright theft, pornography, pro-self-harm and eating disorders, suicide content, and violent material.

Filtering is provided by LGfL. We filter internet use on all devices that access school networks (cabled and wireless). Internet filtering is further extended on all school provided devices that are used off site, including one to one devices issued to students.

Filtering systems allows the School to identify device names or IDs, IP addresses, and where possible, individual users, the time and date of attempted access and the search term or content being blocked.

Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices, systems and networks, and all devices using the School internet connection.

The DSL and leadership team will work with LGfL and our IT service providers to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.

If there is failure in the software or abuse of the system, for example if students or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to turn off monitor/screen, report the concern immediately to a senior member of staff and report the URL of the site to technical staff/services.

Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use and behaviour policies.

Parents/carers will be informed of filtering breaches involving their child, unless to do so would put a child at risk of harm or compromise a criminal investigation.

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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](#).

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.

Appropriate monitoring

We will appropriately monitor internet use on all school/college provided devices and networks to detect safeguarding risks in real or near-real time, including accessing or attempting to access, or engaging with or attempting to engage with illegal and/or harmful/inappropriate content or activity by any user. This is achieved by:

- physical monitoring (supervision),
- monitoring internet and web access (reviewing logfile information) and
- active technology monitoring services.

The School does allow use of personal devices by staff and students. As such, we will ensure they are appropriately monitored in accordance with safeguarding and data protection legislation.

All users will be informed that use of our devices and networks 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 students, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.

Where the concern relates to staff, it will be reported to the headteacher (or Chair of Trustees if the concern relates to the Head Teacher), in line with our staff code of conduct.

Parents/carers will be informed of safeguarding concerns involving their child identified through our monitoring approaches, unless to do so would put a child at risk of harm or compromise a criminal investigation.

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](#).

Information Security and Access Management

The School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in the Data Protection Policy, the Electronic Information and Communications Policy for Staff and the Guidance for Acceptable Use of IT.

We will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

The Deputy Head Teacher and Safeguarding Trustee are responsible for ensuring that our school has met the DfE [cyber security standards](#) for schools and colleges.

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Remote/Online learning

We will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.

All communication with learners and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers or Microsoft Teams. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy, code of conduct, Acceptable Use Guidance and Protocols for Live Communication using Teams.

Staff and students will be encouraged to report issues experienced at home when participating in remote/online learning; concerns will be responded to in line with our child protection and other relevant policies.

When delivering remote learning, staff will follow our [Remote Learning Charter](#) and Protocols for Live Communication in Teams.

Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access.

Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

Online Safety Training for Staff

We will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.

Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding and child protection training approach.

Educating Students

The School will ensure a comprehensive whole school curriculum response is in place to enable all students to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

Working with Parents/Carers

The School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children. Advice is given at information evenings and via the School website.

We will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the School (if anyone) their child is going to be interacting with online. This is achieved by providing information on our school website and relevant policies such as acceptable use and through existing communication channels.

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Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE '[Harmful online challenges and online hoaxes](#)' guidance to ensure we adopt a proportional and helpful response.

14. Staff Induction, Awareness and Training

All members of staff have been provided with a copy of Part One and Annex A of "*Keeping Children Safe in Education*" which covers Safeguarding information for all staff. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex B. Members of staff have to confirm that they have read and understood Part One and Annex A.

It is also 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. Records are held by centrally by HR.

The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training to ensure they are aware of the School's internal safeguarding processes, including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the School's internal safeguarding processes, as part of their induction.

All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. This is achieved via leaflets, specific training by the DSL and by e-Learning. This training is regularly updated and is in line with advice from the safeguarding partners and explores the Kent processes to follow.

All trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is updated annually.

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 members will receive regular safeguarding and child protection updates via the staff bulletin or online training.

All staff members (including temporary staff) will be made aware of the School's expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy.

The School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies.

The DSL and Head Teacher will provide an annual report to the Board of Trustees detailing safeguarding training undertaken by all staff and will maintain up to date record of who has been trained.

Although the School has a nominated safeguarding lead for the Board of Trustees all members of the Board of Trustees will also access appropriate safeguarding training.

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The DSL and deputies will attend the required DSL safeguarding training and continue to update their knowledge on an on-going basis and at least every 2 years as required by guidance. DSL knowledge will also be updated regularly through Kent Safeguarding Children's Multiagency Partnership e-bulletin and any relevant information will be disseminated to staff. The DSL will also review other expert and professional organisations to obtain up-to-date guidance and practical support on specific safeguarding issues (for example through the NSPCC website). School staff are also reminded to access government guidance as required on the specific issues via GOV.UK and other government websites.

15. Safe Working Practice

Our school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.

All members of staff are required to work within clear guidelines on safe working practice and the School's Code of Conduct.

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 should be aware of the School's Behaviour Policy, and any physical interventions must be in line with agreed policy and procedures and national guidance. There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our use of reasonable force policy and behaviour policy and is in line with the DfE '[Use of reasonable force in schools](#)' guidance. Further advice can be accessed in Part Two of KCSIE.

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. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all school staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Where online meetings take place staff must follow the 'Live Communications in Teams' protocol.

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the School's online safety and Acceptable Use guidance.

16. Staff Supervision and Support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

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 will be supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

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Members of the Wellbeing Team will be offered formal individual supervision with a usual frequency of three times in a year. Additional sessions may be offered where appropriate. Group supervision is also made available.

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. Staff can approach the HR officer directly.

17. Safer Recruitment and Safeguarding Checks

Tonbridge Grammar School is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.

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 Board of Trustees and Leadership Team are responsible for ensuring that the School follows safe recruitment processes outlined within KCSIE guidance.

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

The Board of Trustees will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.

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

Staff are advised to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

All staff and volunteers will read the staff code of conduct and understand that their behaviour and practice must be in line with it. Full details are set out in the Safer Recruitment Policy.

Where the School places a student with an alternative provision provider, we will:

- obtain written information from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school would otherwise perform in respect of our own staff.
- obtain written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Where the School organises work experience placements, we will follow the advice and guidance as identified in Part Three of KCSIE.

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

18. Allegations/Concerns raised in relation to members of 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). Ensuring concerns are dealt with effectively will protect those working in or on behalf of the School from potential false allegations or misunderstandings.

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Where the Head Teacher is unsure how to respond, for example if the School is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Head Teacher (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.

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

Concerns that meet the 'harm threshold'

It is recognised that it is possible for any member of staff, including volunteers, trustees, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

This includes when someone has

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

Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Head Teacher 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 Teacher, staff are advised that allegations should be reported to the Chair of the Board of Trustees who will contact the LADO.

If staff are concerned that appropriate safeguarding action is not being taken following an allegation against a colleague, they are advised to follow our whistleblowing process and/or to contact the LADO directly themselves.

Concerns that do not meet the 'harm threshold'

The School may also need to take action in response to 'low-level' concerns about staff.

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 staff code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.

Examples of low-level includes may include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

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Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns should be shared confidentially in line with our staff code of conduct to the DSL. The DSL will inform the Head Teacher of all low-level concerns in a timely fashion according to the nature of each particular concern.

Where low-level concerns are reported to the School, the Head Teacher will be informed and is the ultimate decision maker in respect of the response to all low-level concerns.

The Head Teacher will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).

Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).

Where a pattern is identified, the School will implement appropriate action, for example consulting with the [LADO enquiry line](#) and following our disciplinary procedures.

Safe Culture

As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff 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 such concerns will always be taken seriously by the senior leadership team.

All members of staff are made aware of the School's whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk

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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.

19. 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 Relationships and Sex Education and Health Education.

It is recognised that schools 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 students have a range of contacts and strategies to ensure their own protection and that of others. Online safety is integrated into the curriculum.

The School recognises the crucial role it has to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares students 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.

It is recognised that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach tailored to the specific needs of individual children might be needed for example children who are victims of abuse and children with SEND.

Systems have been established to support the empowerment of children to talk to a range of staff when they are in difficulty and to raise comments, complaints and feedback about their school experience. Children at Tonbridge Grammar School will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate. Records will be kept of reported incidents in line with guidance.

Specific systems outside of expected day to day classroom interaction and support include student support co-ordinator support, form tutor support, school nurse drop-in, concern/worry box, peer mentoring.

The School recognises the value of external organisations and/or speakers visiting to provide useful information or to help enrich children's education. However, the suitability of external organisations or speakers will always be assessed before granting them access to students; this may include an assessment of the educational value, the age/ability appropriateness of content and whether relevant safeguarding checks will be required.

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20. Physical Safety

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. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. Further information regarding our approach and expectations can be found in our use of reasonable force policy and behaviour policy and is in line with the DfE '[Use of reasonable force in schools](#)' guidance.

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 Teacher and Board of Trustees will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the School/[college](#) on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.

The Head Teacher and Board of Trustees will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

Organisations must complete a safeguarding checklist when applying to use the premises. If assurance is not achieved, an application to use premises may be refused.

Safeguarding requirements will be included in any transfer of control agreement (i.e. 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.

21. 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 and supervision 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 school site

For visitors attending in a professional capacity, such as social workers, early help staff, the school will check their ID and be assured that they have had the appropriate DBS check or their employers have confirmed that their staff have appropriate checks.

Any individual who is not known or identifiable should be challenged for clarification and reassurance. A traffic light system for lanyards is used to indicate the level of access to students. Sixth form students are also expected to wear blue lanyards. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

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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 site.

Contractors working on site receive a safeguarding briefing set out in Guidance on Contractors working in School document.

22. Monitoring and Review

The Designated Safeguarding Lead will review systems in place and plan for staff training to keep up with current legislation and guidance.

All school staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers via the School website

The policy will be reviewed at least annually. The policy will be revised following any national or local policy updates, any significant national events, any local child protection concerns and/or any changes to our procedures.

The Wellbeing Team and DSL meet regularly and discuss the needs of pupils causing concern and evaluate the impact and monitoring progress particularly for those at risk.

23. Local Support

All members of staff in Tonbridge Grammar School are made aware of local support available

- **Kent Integrated Children's Services/ Children's Social Work Services and Early Help Intensive Support**
 - [Kent Integrated Children's Services Portal](#) – select 'urgent' if there is an immediate risk/concern
 - Front Door Service No name Consultation: 03000 411111
 - Out of Hours Number: 03000 419191
 - Kent Support level guidance: www.kscmp.org.uk/guidance/kent-support-levels-guidance
- **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
 - PCSO Toni Matthew - Youth Engagement officer, Tonbridge and Malling Community Safety Unit
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - kscmp@kent.gov.uk
 - www.kscmp.org.uk
 - 03000 421126
- **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

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- **Kent LADO Education Safeguarding Advisory Service (LESAS)**
 - [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#)
 - To refer to the LADO following an allegation being made against a member of staff, complete a referral on the [Kent Integrated Children's Services Portal](#).
 - To enquire if a LADO referral should be made, to request strategic education safeguarding or online safety advice, or request other LESAS commissioned services/support, please use the [LESAS enquiry form](#).

24. National Support

KSCMP

- Factsheets: [www.kscmp.org.uk/training/factsheets](#)
- Supporting resources: [www.kscmp.org.uk/training/training-resources](#)
- Video explainers: [www.kscmp.org.uk/training/video-explainers](#)
- Missing children: [www.kscmp.org.uk/guidance/missing-children](#)

NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](#) or help@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](#)
- NSPCC Whistleblowing helpline: [www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/](#)

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 Students

- NSPCC: [www.nspcc.org.uk](#)
- ChildLine: [www.childline.org.uk](#)
- Papyrus: [www.papyrus-uk.org](#)
- Young Minds: [www.youngminds.org.uk](#)
- The Mix: [www.themix.org.uk](#)
- Shout: [www.giveusashout.org](#)
- Fearless: [www.fearless.org](#)
- Victim Support: [www.victimsupport.org.uk](#)
- Lucy Faithfull Foundation 'Shore Space': <https://shorespace.org.uk/>

Support for adults

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

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- Advice now: www.advicenow.org.uk

Support for Special Education Needs and Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>
- Kent Autistic Trust: www.kentautistictrust.org/
- AFASIC: www.afasic.org.uk/
- National Autistic Society: www.autism.org.uk/
- Kent County Council: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children
- Portage: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-children-under-5/portage-supporting-pre-school-children-with-send
- Information Advice and Support Kent (IASK): www.iask.org.uk/

Contextual Safeguarding Network

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

Kent Resilience Hub

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

Substance Misuse

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

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: <https://kentandmedwayvru.co.uk/>
- 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
- The Children's Society: www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

So-called Honour based Violence

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

Radicalisation and hate

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- Kent Prevent Education Officers: www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education
- 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

Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk
- Diana Award: www.antibullyingpro.com/
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk
- Lucy Faithfull Foundation 'Shore Space': <https://shorespace.org.uk/>

Mental Health

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

Mental Health

- KSCMP: www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): www.nelft.nhs.uk/services-kent-children-young-peoples-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/
- MindEd: <https://mindedforfamilies.org.uk/>

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.ceopeducation.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet International: 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

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- NSPCC: www.nspcc.org.uk/onlinesafety
- 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
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org
- KSCMP: www.kscmp.org.uk/guidance/online-safety

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

Children with Family Members in Prison

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

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Additional Government Advice and Support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
"Honour Based Violence" (so-called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage: statutory guidance and government advice	Foreign Commonwealth Office and Home Office
Health and Wellbeing	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	MHCLG
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety

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Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy

Linked Policies

- Anti-Bullying
- Attendance
- Behaviour
- Complaints
- Curriculum
- Data Protection and Information Sharing
- Educational Visits
- Emergency procedures such as evacuations and lockdowns
- Guidance on Contactors working in school
- Health and Safety (Risk Assessments)
- Image Use
- Managing Allegations Against Staff
- Mobile Phone Charter
- Online Safety
- Relationship, Sex and Health Education (RSHE)
- Risk assessments: Individual Health Care Plans, Support and Risk Plans, and Temporary Person Risk Plans e.g. for temporary health conditions and for school trips
- Safer Recruitment
- Search and confiscation
- SEND
- Social Media (staff)
- Supporting Students with Disabilities in School
- Supporting Students with Medical Needs
- Staff Code of Conduct
- Staff Discipline
- Use of Reasonable Force
- Whistleblowing

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

- “Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - [Safer Recruitment Consortium](#)
- “What to do if you are worried a child is being abused” – DfE, March 2015

These documents can be found in the staff room and on the staff intranet.

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APPENDIX 1 - Categories of Abuse

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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. Abuse can be carried out both on and offline and be perpetrated by men, women and children.

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

Signs that MAY INDICATE physical abuse

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

Emotional Abuse: is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 and may include interactions beyond the child's developmental ability, overprotection, limitation of exploration or learning, prevention of normal social interaction. Seeing or hearing ill-treatment of another, serious bullying (including Cyberbullying) causing children to frequently feel frightened or in danger, or exploitation and corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

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

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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 penetrative (i.e. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or the production of, sexual images, or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

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

The [Centre of Expertise on Child Sexual Abuse](#) provides resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

Neglect

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

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APPENDIX 2 – Child Absent from Education

The School follows the DfE statutory guidance: [Working together to improve school attendance](#) and Kent County Council procedures.

What do we mean by Children Absent from suitable Education?

A compulsory school-age child who is not on the roll of a school, not placed in alternative provision by a local authority, and who is not receiving a suitable education at home.

Why do children go missing from education?

There are a number of reasons, including:

- they don't start school at the appropriate time and so they do not enter the educational system;
- they are removed by their parents for a range of reasons;
- they cease to attend due to exclusion, illness or bullying;
- they fail to find a suitable school place after moving to a new area;
- the family move home regularly or there are problems at home.

What is the process for Schools?

The first 10 days of non-attendance are investigated by the School in line with the attendance policy.

After 10 days of continuous non-attendance, the School refers to the Attendance Service so that an Education Welfare Officer can make further enquiries.

After 20 days of continuous non-attendance and following investigations by the School and EWO, the child could be classified as being absent from education. If this is the case, then a referral must be completed by the School and forwarded to the Inclusion & Attendance Lead.

With confirmation from the Local Authority, the child may then be off rolled in line with Regulation 8 of Education (Pupil Registration) (England) Regulations 2006. The School will need to upload a Common Transfer File (CTF) for the pupil to the DfE Secure Data Transfer site (S2S) using the relevant code.

The form is then forwarded by the Inclusion & Attendance Lead. The team will carry out local, regional and national checks to locate the child and ensure they are receiving suitable education.

Before a school off rolls a pupil this procedure must always be carried out.

Any questions regarding children absent from education should be directed to 03000 412121.

Child Protection and Safeguarding Policy

Review: annually

Approval level: Board of Trustees

APPENDIX 3 – Further Information on Specific Safeguarding Issues

Child Sexual Exploitation (CSE): This involves exploitative situations, contexts and relationships where young people (now known also known as children) receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. CSE involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people (now known also known as children) who are being sexually exploited do not exhibit any external signs of this abuse. In suspected cases of CSE, the School will use the KSCMP Safeguarding Children at risk of Sexual Exploitation Risk Assessment Toolkit.

Radicalisation and Extremism: All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

“Extremism” is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations.

In suspected cases the School will use the Prevent Duty Guidance (HM Government 2015) and in consultation with the West Kent Safeguarding Education Adviser, may refer to the Kent Police Channel Co-ordinator.

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

If staff have a concern that an act of FGM may have been carried out they should activate the School’s safeguarding procedures and the DSL will follow existing national and local protocols for multi-agency liaison with police and children’s social care. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is be a statutory duty upon that individual to report it to the police. Further Guidance is covered in the document *Multi-Agency Practice Guidelines: Female Genital Mutilation* (HM Government 2014) available in the Safeguarding area of the staff network.

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Review: annually

Approval level: Board of Trustees