St. Andrew's School

UKIS Safeguarding and Child Protection Policy and Procedures

Maintenance

Policy Written By	**Funmi Lakanu**
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Approved by Director of Schools / Chair of Governors, Deborah Leek-Bailey – 01/09/2026

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KEY PEOPLE and CONTACTS

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mscp@medway.gov.uk
Address: 5th Floor, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR

Children Services Social Care (Children's Advice and Duty Services (CADS)
Medway Council
Gun Wharf Chatham
Kent ME4
4TR
01634 334 466

ss.access&info@medway.go.uk

Kent Safeguarding Children Multiagency Partnership- KSCMP
Telephone: 03000 42 11 26 Email: kscmp@kent.gov.uk
Address: Room 2.71, Sessions House, Maidstone, ME14 1XQ

Local Authority Designated Officer (LADO) Telephone: 01634 331 065
Email: child.protection@medway.gov.uk
Local Police Force
Telephone: 101 (the non-emergency police number)

Prevent
Preventing Extremism in Schools and Children's Services counter.extremism@education.gsi.gov.uk
Telephone 020 7340 7264
Department for Education (DfE) – 0207 340 7264 counter-extremism@education.gsi.gov.uk

Key School Contact details:
DSL: Mrs Funmi Lakanu (Assistant Principal) (also trained in Prevent and Channel and responsible for online safety) School: 01634 843479
Deputy DSL: Mrs Emma Steinmann-Gilbert (Principal) School: 01634 843479

Deputy DSL: Miss Nicola Marshall (Assistant Principal) School: 01634 843479
Deputy DSL: Mrs Noelle Odie (Head of Pre-School) (Designated DSL for EYFS) Preschool: 01634 843393
Deputy DSL: Mrs Pearl Koi (Deputy Preschool Manager) Preschool: 01634 843393
Deputy DSL: Mrs Nicky Coyle (Business Manager) School: 01634 843479
Deputy DSL: Mrs Fellows (Holiday Club Supervisor & HLTA) School: 01634 843479

Deputy DSL: Mrs Privsa (Holiday Club and After School Club Supervisor & Teaching Assistant) School: 01634 843479

Deputy DSL: Mrs Conway (Breakfast Club Supervisor & Office Administrator) School: 01634 843479

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Sarah Farquhar

Education Development Trust Chair of the Board of Trustees
Anne Tutt

POLICY STATEMENT, PURPOSE, COMMITMENT and PROCEDURES

0. General statement of St. Andrew's and Education Development Trust's commitment to safeguarding

This Policy applies to **all** pupils in the school, including EYFS.

The school is particularly aware of the vulnerability of certain groups including:

- those with Special Educational Needs and Disabilities (SEND)
- those with social workers
- those in kinship care
- children missing education
- children who are privately fostered
- young carers
- children who are lesbian, gay, bisexual or questioning their gender identity (recognising that questioning a child's gender identity alone is not a safeguarding concern)
- children who may be experiencing mental health difficulties where these may become a safeguarding concern
- those at risk of exploitation, abuse or neglect
- those at risk of online harm

The school recognises that additional barriers can exist when identifying abuse and neglect in these groups and that all staff should be alert to these vulnerabilities, in accordance with KCSIE 2026.

The school also recognises that safeguarding is an inclusive responsibility and that children may experience multiple and intersecting vulnerabilities. Staff will consider how protected characteristics, lived experiences, disability, communication needs, family circumstances and contextual safeguarding factors may increase risk or affect a child's ability to disclose abuse**.**

It is a requirement for ALL teaching, non-teaching, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school based Education Development Trust staff who visit the school, trustees & proprietor body and any other adults working at the school read and to follow this policy. All visiting speakers are checked as suitable (whether invited by staff or pupils) and supervised at all times.

Where external providers, contractors or organisations deliver activities to pupils, the school will undertake appropriate safeguarding assurance, including verifying identity, safeguarding arrangements, suitability checks where appropriate, supervision arrangements and expectations regarding professional conduct.

The school maintains a record of speakers where appropriate and the school's vetting procedures ensures that speaker content aligns with British values and safeguarding expectations**.** St. Andrew's will operate safeguarding procedures in line with the local safeguarding partnership arrangements and relevant multi-agency safeguarding procedures.

Education Development Trust aims to ensure the highest standards of care and protection when working with children and adults at risk. Education Development Trust's overarching Global Safeguarding Policy should therefore be read and followed by all our employees and volunteers, alongside St. Andrew's Safeguarding Policy and Procedures.

St. Andrew's School is committed to safeguarding and promoting the welfare, **physical health, mental health and wellbeing** of every member of the school community, by creating and maintaining an open, safe, caring, and supportive atmosphere. The school actively promotes a safeguarding culture in which children feel safe, are encouraged to talk, know who they can speak to if worried, understand how concerns will be taken seriously and are supported to develop resilience, healthy relationships and safe behaviours both online and offline**.** St. Andrew's also actively promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities.

This includes:

- proactively teaching pupils about safeguarding
- ensuring that systems and procedures are in place to protect pupils
- always acting in the best interests of the child
- providing early help where appropriate
- working openly and collaboratively with parents, carers and involvement of partner agencies by providing universal services and community-based early help, and the targeted early help level of Family Help whenever it is in the child's best interests
- listening to children, taking their wishes and feelings into account and ensuring that they know they will be heard and taken seriously.

At St. Andrew's, our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of every child is paramount
- safeguarding and promoting the welfare of children is everyone's responsibility
- safeguarding is embedded throughout the whole school culture and is reflected in leadership, governance, curriculum, recruitment, behaviour, attendance, staff conduct and decision-making
- everyone who works with our pupils should make sure that they consider at all times what is in the best interests of the child
- all safeguarding decisions will be child-centred and informed by the wishes, feelings, lived experience and best interests of the child
- all children, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection
- safer and secure children make more successful learners
- all staff understand that safeguarding incidents and concerns can be associated with factors outside the school and/or can occur between children outside school, including online
- staff recognise that child-on-child abuse may be physical, sexual, emotional, online, coercive, abusive or exploitative and that victims will always be supported, protected and listened to
- all staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm and take appropriate action immediately, report concerns to the DSL without delay and, where required, make referrals to external agencies. This also relates to a child being at risk due to extremist behaviours and/or influences
- all staff understand that safeguarding incidents and concerns can occur inside school, outside school, online, within families, within peer groups and within the wider community, including through extra-familial harm and contextual safeguarding
- policies and their implementation will be monitored and reviewed annually, unless an incident or new legislation or guidance suggests the need for an interim review by Education Development Trust (the school's proprietors)
- the proprietor and governors the proprietor and governors will receive safeguarding information and assurance regularly to enable them to challenge, support and monitor safeguarding effectiveness
- the Designated Safeguarding Lead (DSL) and Deputy DSLs will undertake complete formal multi-agency safeguarding training at least every two years and undertake continual professional development through regular updates

- all staff will read and understand at least Part One (or Annex A where appropriate) of Keeping Children Safe in Education 2026 and confirm that they have done so.
- all staff will understand and comply with the staff behaviour/code of conduct, whistleblowing procedures, acceptable use of technology expectations and safeguarding responsibilities relevant to their role
- all staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.
- the school will ensure that effective mechanisms are in place to support staff in carrying out their safeguarding responsibilities and that safeguarding remains central to the school's culture
- all staff will receive safeguarding and child protection training, including online safety, at induction and will receive regular safeguarding updates (including through staff meetings, briefings and emails) as required, but at least annually, to provide them with the relevant knowledge and skills to safeguard children effectively
- the DSL will be given the appropriate authority, status, time, funding, training, resources and support necessary to carry out the role effectively.
- All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate
- the DSL will be sufficiently independent to challenge decisions where necessary and to escalate concerns where thresholds for intervention are not being met
- at St. Andrew's, all staff adopt the attitude of "it could happen here"**.** Staff are expected to exercise professional curiosity and recognise patterns of cumulative concern that may not appear significant in isolation
- work with parents and carers wherever it is safe and appropriate to do so, recognising that in some circumstances involving abuse, neglect or exploitation, informing parents immediately may not be in the child's best interests
- all staff recognise the importance of professional curiosity and maintaining an attitude of respectful challenge where appropriate
- Safeguarding includes protecting pupils from online harm. The school recognises that technology presents both opportunities and risks and that children may be exposed to abuse, exploitation, bullying, harmful content, misinformation, disinformation, extremist material, online scams, AI-generated content, online sexual abuse, coercion and grooming.
- The school maintains effective filtering and monitoring systems, undertakes regular review of these arrangements, provides age-appropriate online safety education to pupils and regular training for staff, and works with parents to promote safe and responsible use of technology, in accordance with KCSIE 2026.

1. Definitions and legal framework

2.1 At St. Andrew's, our understanding of safeguarding and promoting the welfare of children is defined as:
providing help and support to meet the needs of children as soon as problems emerge through high-quality Early Help and pastoral support (Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse).

- protecting children from maltreatment, whether that is within or outside the home, including abuse perpetrated by other children and including online harms such as exposure to sexual content, extremism, misinformation, disinformation, conspiracy theories, fraud, coercion and harmful use of AI-generated content including synthetic media, deepfakes, image-based abuse, online extortion (including financially motivated sexual extortion), harmful algorithms and emerging technologies
- preventing impairment of children's mental and physical health or development.
- recognising that safeguarding includes emotional wellbeing where mental health concerns may become

indicators of abuse, neglect, exploitation or trauma rather than viewing mental health in isolation

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes through effective safeguarding, early intervention and multi-agency working
- all safeguarding decisions will be child-centred, evidence-informed and proportionate, taking account of the child's wishes, feelings, voice, lived experience, identity, communication needs and best interests
- recognising that attendance, punctuality, and children missing education are safeguarding issues that must be monitored and acted upon
- making sure that all adults working with children are suitable to do so, through safer recruitment and ongoing vigilance
- recognising that safeguarding includes protecting children from abuse, neglect, exploitation and contextual safeguarding risks including criminal exploitation, sexual exploitation, serious violence, county lines, domestic abuse, honour-based abuse, forced marriage, female genital mutilation, modern slavery, trafficking and radicalisation occurring within families, peer groups, schools, communities and online environments
- recognising that safeguarding is everyone's responsibility and that no single practitioner can have a full picture of a child's needs and circumstances. Effective safeguarding therefore depends upon timely information sharing, professional curiosity and effective multi-agency working.

2.2 This policy should be read in relation to the most current version of the following documents:

- Keeping Children Safe in Education (KCSIE) 2026
- Crime and Policing Act 2026, and the Disclosure and Barring Service's change to the definition of regulated activity with children, which removes the supervision exemption for volunteers from 1 September 2026
- Disqualification under the Childcare Act 2006 (as amended), including the Childcare Disqualification Regulations 2018
- What to do if you're worried a child is being abused (March 2015)
- Working Together to Safeguard Children 2026
- Information sharing advice for safeguarding practitioners (May 2024) Counter Terrorism and Security Act 2015
- Female Genital Mutilation Act/FGM Act 2003
- Prevent Duty Guidance for England and Wales (July 2023) in addition to The Prevent Duty: The Prevent Duty: Department for Education departmental advice for schools and childcare providers (current version) and the use of social media for online radicalisation (2015)
- Early Years Foundation Stage Framework (current version)
- The Education (Independent School Standards) Regulations 2014
- Domestic Abuse Act 2021- The new legislation recognises that children witnessing domestic violence/abuse in the home are also victims in their own right
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated July 2025)
- Working Together to Improve School Attendance (May 2024) *(now statutory from Sept 2024)*
- Children Missing Education – Statutory Guidance (2016, updated where applicable)
- DfE Filtering and Monitoring Standards (Sept 2023)
- DfE Generative AI Guidance (2024)
- Online Safety Act 2023 (selected provisions relevant to children)
- UK GDPR and Data Protection Act 2018 *(for information sharing)*
- Meeting Digital and Technology Standards in Schools (current DfE guidance)
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended), where relevant to safer recruitment
- Refer to and work from the most up-to-date statutory guidance, including Restrictive Interventions, including the use of reasonable force, in schools (from April 2026); and DfE Guidance 2026 on the ISSRs

1 This policy is reviewed and updated at least annually to ensure compliance with DfE statutory guidance, Home Office Prevent statutory guidance and to ensure that our safeguarding and child protection procedures reflect our safeguarding partners and relevant agency arrangements.
The Designated Safeguarding Lead will monitor updates to legislation and statutory guidance throughout the year and recommend interim amendments where required to ensure safeguarding arrangements remain fully compliant.
The school monitors for interim updates to guidance, including KCSIE and Working Together, and amends internal practices accordingly. The school will always refer to the above statutory guidance as the benchmark for all safeguarding practice and decision making.
The proprietor, governors and DSL will also review safeguarding practice following any serious incident, safeguarding review, learning review or changes to local safeguarding partnership arrangements.

2.3 Our Safeguarding Policy and Procedures should be read alongside a suite of policies which include:

- Education Development Trust's overarching Global Safeguarding Policy
- Education Development Trust's Digital Safeguarding Policy
- Education Development Trust's overarching Protection from Sexual Exploitation, Abuse and Harassment Policy
- Education Development Trust's Whistleblowing Policy
- Education Development Trust's overarching Code of Conduct and school Staff Code of Conduct
- Safer Recruitment Policy
- Education Development Trust's Reference Policy
- Health & Safety Policies
- Acceptable Use of Cameras & Mobile Devices Policy
- Education Development Trust's Social Media Policy
- Education Development Trust's DBS Policy and procedure
- Nappy Changing and Intimate Care Policy
- Child Missing Education policy
- First Aid/Accident/Medicines Policies
- Supervision Policy
- Mental Health and Wellbeing Policy
- Education Development Trust's Disciplinary Policy and procedure
- Education Development Trust's Dignity at Work Policy
- Education Development Trust's Inclusion and Diversity Policy
- St. Andrew's RSE policy
- Behaviour Policy
- Anti-Bullying Policy
- Online Safety Policy
- Attendance Policy
- Missing Child Policy
- SEND Policy
- Staff Acceptable Use of Technology Policy
- Data Protection and Records Retention Policies

2. Roles and Responsibilities

The Senior Mental Health First Aider is also the DSL. The school recognises that a child's mental health can become a safeguarding concern where there are indications of self-harm, suicidal ideation, or serious self-neglect. Staff are trained to recognise warning signs including significant changes in behaviour, withdrawal, sleep difficulties and physical signs of self-harm. Any concern of this nature will be referred to the DSL immediately. Where a member of staff believes a child is in immediate danger, they will call 999 or accompany the child to accident and emergency without delay.

2.1. Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is the senior member of staff responsible for leading safeguarding and child

protection in the school, including online safety. The DSL is a member of the school leadership team and takes the lead responsibility for safeguarding and child protection in the school.
The governing body ensures that the Designated Safeguarding Lead has the appropriate expertise, experience, authority and capacity to fulfil the role effectively. The governing body reviews the DSL's workload and training as part of its annual safeguarding oversight and will consider whether additional support or time release is required.

The DSL will ensure that there is always cover for their role (including for any out-of-hour activities/out-of-term activities) and that arrangements for cover are communicated clearly to staff.

The DSL will:

Read and implement the responsibilities set out in Annex C of Keeping Children Safe in Education 2026 and fulfil all statutory responsibilities, including:

- be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with this policy and statutory guidance's
- be responsible for ensuring that MyConcern, the school and Trust's online safeguarding and child protection case management system is kept up to date and that all child protection files are accurately maintained. The system is a secure and password protected system, which includes concern summaries, details of the concern and how it was followed up, notes on actions, decisions reached and outcomes
- be responsible for ensuring that child protection logs are transferred to a new school promptly and within five days of an in-year transfer or the start of a new term. The child protection file will be transferred separately from the pupil's main file, ensuring secure transit and confirmation of receipt obtained and retained for records. The DSL may choose to contact the new school to provide
- additional information that would be useful for the new school to know in advance so that it can put the right support in place to safeguard the child.
- refer cases of suspected abuse or allegations to the local Children's Social Services Department and/or the police in accordance with annually
- safeguarding partner procedures, and work with other agencies in line with Working Together to Safeguard Children;
- liaise with staff (especially pastoral support staff, IT technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- receive Prevent awareness training; provide advice and support, and make appropriate referrals through the Channel programme
- be aware of the latest national and local guidance and requirements and keep the principal, staff and volunteers informed as appropriate
- receive appropriate training in child protection matters and interagency working, to include both national and local bodies, at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, in order to keep up with developments relevant to the role
- have oversight of the online filtering and monitoring process ensuring that systems meet the DfE Filtering and Monitoring Standards (2023), are regularly reviewed, risk-assessed, and reflect the specific needs and risks within the school context.
- ensure timely referrals to Prevent/Channel and maintain up-to-date knowledge of referral thresholds and escalation processes in line with local authority Prevent pathways.
- ensure that the principal, staff, and volunteers have access to and understand their role as appropriate in the child protection procedures, including but not limited to part-time staff, supply staff, peripatetic staff, newly appointed staff, newly qualified staff, before/after school care staff, gap year students,
- volunteers, catering staff, cleaning staff and caretakers
- act as a source of advice and support within the school and co-ordinate action regarding referrals in relation to both children and allegations against staff
- provide support, advice and challenge to staff to ensure safeguarding decisions remain child-centred and

evidence-informed

- refer cases where a crime may have been committed to the police as required
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership. This could include:
    - ensuring all staff know who these children are
    - understand their academic progress and attainment
    - maintain a culture of high aspirations for this cohort
    - support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to support these children;
    - work closely with the Head of Safeguarding adviser and Director of Schools on reporting any serious incidents or allegations promptly, in accordance with Trust procedures. The Trust will coordinate referring cases where a person is dismissed on safeguarding grounds or is assessed as a potential risk to children, to the Disclosure and Barring Service and Teaching Regulation Agency, as applicable.
    - support and lead on the mental health provision for pupils recognising that emerging or worsening mental health needs may be indicators of safeguarding concerns and support the Mental Health First Aider for adults - each school has a number of trained staff – with fulfilling their responsibilities when supporting an individual with a mental health concern or condition;
    - participate in the school's DSL community of practice and Education Development Trust's Global Safeguarding Community of Practice.
    - stay informed about emerging risks related to online safety, including use of AI, deepfakes, and online misinformation, ensuring staff and pupils are educated on identifying and reporting such risks.
    - promote a culture of professional curiosity, respectful challenge and reflective safeguarding practice throughout the school
    - ensure that children's wishes, views and lived experiences remain central to safeguarding decision-making
    - ensure that safeguarding information is shared appropriately, lawfully and proportionately in accordance with UK GDPR, the Data Protection Act 2018 and Information Sharing Advice for Practitioners (2024**).**

For further information regarding the statutory responsibilities of the Designated Safeguarding Lead, staff should refer to Annex C of Keeping Children Safe in Education 2026, which should be read alongside this policy.

3. Deputy DSL

- The school has a trained deputy Designated Safeguarding Lead who is available to take responsibility in the DSL's absence. A confidential shared system is in place to ensure that safeguarding concerns reported during any period of absence are received, reviewed and acted upon without delay.
- Deputy Designated Safeguarding Leads are trained to the same standard as the Designated Safeguarding Lead and, whilst the lead responsibility remains with the DSL, deputies will have the knowledge, skills, authority and capacity to carry out the role effectively whenever required.

3.1. All staff, including those working in unpaid roles, have the following responsibilities:

- contribute to providing a safe environment in which all children can learn and flourish
- be familiar with, and adhere to, Education Development Trust's overarching Global Safeguarding Policy, EDT's Digital Safeguarding Policy, Protection from Sexual Exploitation, Abuse and Harassment Policy, and the school's Safeguarding and Child Protection Policy and procedures, aimed at promoting and safeguarding the welfare of children
- attend mandatory child protection and safeguarding training appropriate to their role
- receive regular safeguarding updates (at least annually) and understand emerging risks including online harms, child-on-child abuse and contextual safeguarding risks

- abide by the staff Code of Conduct, maintaining high standards of professional and personal conduct;
- know how to respond appropriately to a disclosure by listening carefully, avoiding leading questions, reassuring appropriately, making an accurate contemporaneous record and reporting concerns immediately to the DSL
- know what to do if you are concerned about the behaviour or conduct of an adult in the school
- manage the requirement to maintain an appropriate level of confidentiality, never promising a child that you will not tell anyone and explaining why you must tell another trusted adult who can help
- identifying children who may benefit from early help early intervention is a key safeguarding responsibility
- be aware of our local early help process and the school's role in it
- report all safeguarding concerns immediately to the DSL (or Deputy DSL in their absence) and understand that any member of staff may make a referral to Children's Social Care if they believe this is necessary to safeguard a child
- be aware of the process for making a referral to Children's Social Care and understand the role you might be expected to play in statutory assessment
- if at any time there is a risk of immediate serious harm to a child, a referral should be made to children's social care or the Police immediately, without delay, and the DSL informed as soon as possible afterwards
- understand that poor attendance and persistent absence are safeguarding indicators and escalate concerns in line with the school's attendance and safeguarding policies
- recognise that repeated lateness, unexplained absences, patterns of absence or sudden changes in attendance may indicate abuse, neglect or exploitation
- recognise that safeguarding concerns may arise from situations both inside and outside school, including peer relationships, family circumstances and online activity (contextual safeguarding)
- be professionally curious and ask appropriate questions where concerns arise, rather than accepting explanations at face value where there are safeguarding indicators
- be aware that children may be at risk of harm from other children (child-on-child abuse), including bullying, sexual violence, sexual harassment and online abuse, and that all such concerns must be reported immediately
- understand the importance of sharing information promptly and appropriately with safeguarding colleagues in line with UK GDPR and Information Sharing Guidance (2024), where it is necessary to safeguard a child

3.2. The role of the Proprietor

The accountability for safeguarding rests with Education Development Trust, the proprietors of St. Andrew' school.

Education Development Trust's Board of Trustees is ultimately accountable for ensuring that the organisation has appropriate structures, processes, and resources in place to ensure safeguarding is integrated throughout the organisation and its independent schools. The chief executive is the senior accountable officer for all aspects of safeguarding across the organisation and delegates safeguarding responsibilities for the schools to the head of UK independent schools.

Together with the Head of Safeguarding, the head of the independent schools and the school's leadership team ensure that:

- all staff read at least Part One of Keeping Children Safe in Education 2026 and that those working directly with children also understand Annex A where applicable to their role
- all staff follow the requirements of this Safeguarding and Child Protection Policy and Procedure
- all safeguarding arrangements take into account the procedures and practices of local authorities as part of the inter-agency procedures set up by local safeguarding partners and that the school works in line with their local inter-agency procedures
- the school has a Staff Code of Conduct in place
- responsibilities regarding DfE statutory guidance, Children Missing from Education, are followed, including reporting to the local authority the removal of a child from the school roll in line with statutory and local authority guidance
- the school has effective arrangements for identifying and responding to children missing education, children

missing from home or care, and children who are persistently absent

- all trustees, governors and staff receive appropriate safeguarding and child protection training (including online safety) at induction and access regular refresher and update training to ensure knowledge remains current
- the Board of Trustees receives regular safeguarding oversight reports, including data on safeguarding concerns, referrals, training compliance, filtering and monitoring, and any serious incidents
- appropriate filtering and monitoring systems are in place to keep children safe online, and are regularly reviewed in line with DfE Filtering and Monitoring Standards and current safeguarding risks
- work closely with those responsible for filtering and monitoring to ensure that safeguarding risks identified through monitoring are acted upon promptly and proportionately
- children are taught about safeguarding, including online safety
- they fulfil their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public sector Equality Duty), and the school's multi-agency safeguarding arrangements
- there is clear oversight of safer recruitment practices, including assurance that all required pre-employment checks are completed and recorded in line with statutory requirements
- low-level concerns systems are in place, understood and actively used to support a strong safeguarding culture and early identification of potential staff concerns
- there is effective oversight of safeguarding culture, including professional curiosity, whistleblowing arrangements, and the management of allegations against staff
- safeguarding arrangements explicitly consider contextual safeguarding risks, including peer groups, community risks and online environments
- there is oversight of digital safeguarding strategy, including the safe, responsible and ethical use of emerging technologies such as artificial intelligence in teaching, learning and school operations

3.3. Director of Schools

The proprietor and CE delegate safeguarding operational responsibility to the Director of UK Independent Schools who maintains oversight of each school's implementation of its safeguarding policy and procedures. The Director of Schools provides support, guidance and challenge to the Principal and DSL in all aspects of this policy and procedures and completes the annual on-site audit with the Head of Safeguarding.

4. Training and Induction

4.1. Training for DSL and Deputy DSLs

The DSL and Deputy DSLs will undergo training to provide them with the knowledge and skills required to carry out their role, including inter-agency working and PREVENT. This training is updated at least every two years and is subsidised by continuous professional development arrangements and ongoing safeguarding training. In addition to the formal training set out above, the DSLs' knowledge and skills will be refreshed via informal updates (this might be via e-bulletins, meeting other DSLs via the Trust's global safeguarding community of practice and the UK independent schools' bimonthly DSL meeting, and taking time to read and digest safeguarding developments) at regular intervals, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), young carers, and looked-after children and recently looked-after children
- are alert to the different forms of child-on-child abuse including bullying
- are alert to the signs and indicators of child sexual exploitation and child criminal exploitation

- know how to assess and manage low level concerns about school staff
- are able to keep detailed, accurate, secure written records of concerns and referrals on MyConcern
- understand and implement the Trust's robust approach to data protection, completing training and keeping up to date with data protection policy and procedures
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation, and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- ensure that a child has an appropriate adult with them when engaging with other statutory authorities and police investigations
- encourage a culture of listening to children and taking account of their wishes and feelings in any measures the school put in place to protect them

Looked-after and recently looked-after children
The DSL is appointed as the designated lead for looked-after children (LAC) and previously looked-after children (PLAC) and is responsible for ensuring that these children are safe, supported and able to achieve their full educational potential.

The designated lead will work in close partnership with the Virtual School Head (VSH) and other statutory agencies to ensure that the school fulfils its responsibilities as a corporate parent.

The DSL will liaise with the Virtual School Head for looked-after and previously looked-after children, ensuring that Personal Education Plans (PEPs) are in place, regularly reviewed and of high quality and that any identified barriers to learning are addressed promptly.

4.2. Induction for new staff

At induction, all new staff must be provided with, should read, and should be trained in:

- Keeping Children Safe in Education – Part One and Annex A, B and C
- This Safeguarding and Child Protection Policy and Procedure, including whistleblowing arrangements and the Trust's Whistleblowing Policy which is relevant for all school staff and stakeholders
- Corporate and school Staff Code of Conduct and Acceptable Use of IT Policy, including staff/pupil relationships and communications
- Online Safety Policy (including use of social media)
- Children Missing from Education Policy
- Behaviour Policy
- School Anti-bullying and Anti-cyber-bullying policies
- Mental Health Policy
- During induction, new staff must be informed of the names and role of the Designated Safeguarding Lead and Deputies
- Education Development Trust's mandatory safeguarding awareness eLearning course;
- Safeguarding and child protection courses provided by the school via online provision and face-to-face sessions that include training in wider safeguarding issues such as adverse childhood experiences, dealing with bereavement and loss, and preventing bullying.

4.3. Training for all staff and volunteers

All staff employed in school will receive annual safeguarding and child protection training, usually at the commencement of the academic year. Staff also receive safeguarding and child protection updates regularly throughout the year, provided by

the DSL, in order to provide them with relevant skills and knowledge to safeguard children effectively, for example, learning about the topics in Annex A & B (KCSIE). Co-ordinating and delivering staff training is also part of the DSL's role.

Part 1 KCSIE must be read by all staff, and Annex A, B, & C by school leaders and those who work directly with children.

All staff will be trained to manage a report of child-on-child abuse including bullying, sexual violence and sexual harassment. All staff will be trained on how to recognise low level concerns and reporting low level concerns to the principal. Staff training also includes PREVENT to help identify children at risk of radicalisation. Staff also undertake training to ensure they can respond to online safety requirements.

All staff will receive training on the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

5. Provision for Teaching Children to Keep Themselves Safe

6. Education Development Trust, through its monitoring and oversight procedures, ensures that its schools have actively considered how children will be taught about safeguarding, including online safety, through the curriculum and PSCHE. Particular attention is paid to helping children understand risky behaviours, including the safe use of electronic equipment and the internet. Where possible, teaching is age-appropriate and delivered through a planned component of the curriculum contained within the PSCHE Scheme of Work. Children are taught to understand the risks posed by adults or young people who use the internet and social media to bully, groom, or abuse others.

St. Andrew's addresses safeguarding themes including respectful relationships, misogyny, homophobia, biphobia, racism and harmful online content through its PSHE and RSHE curriculum, in line with Education Development Trust's zero tolerance approach.

Teaching in these areas is planned, progressive and age appropriate. The curriculum is reviewed annually by the DSL and the curriculum led to ensure it remains consistent with current guidance and reflects emerging risks.

The school's Relationships, Sex and Health Education curriculum is reviewed against both the statutory RSHE guidance and Keeping Children Safe in Education to ensure full alignment.
Staff are trained to recognise that exposure to misogynistic, discriminatory, extremist, or harmful online content and attitude**s**, including online, is a safeguarding concern and may indicate or contribute to harmful behaviour. Such concerns will be reported to the DSL and addressed through both safeguarding and curriculum responses.

6.1. At St. Andrew's, we are committed to ensuring our policy aims are put into practice by:

- Respecting the human rights of every child and treating each child respectfully at all times, ensuring that all adults and staff do not harm or humiliate any child;
- Delivering skills through the curriculum, especially via PSCHE;
- Creating an environment and ethos in which children feel secure, valued, encouraged to talk, and are listened to;
- Providing suitable support and guidance so that children have a range of appropriate adults whom they feel confident to approach if they are in difficulties or suffering;
- Using the curriculum to raise pupils' awareness and build confidence so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others;
- Ensuring that staff treat all children with respect, and all children are expected to treat each other and staff with respect—fostering a mutually respectful culture;
- Monitoring the role models the school offers pupils through staffing, materials used, selection of curricular content, and other experiences;
- Teaching pupils the importance of rejecting violence as a means of resolving conflict;
- Regularly reviewing and evaluating our school policies and practices of social control and behaviour modification;
- Providing pupils with opportunities to understand, and strategies for coping with, stress;
- Providing all pupils opportunities to learn about child development and good parenting;
- Including in the Curriculum/PSCHE programmes information on personal safety;
- Understanding that the personal and family circumstances and lifestyles of some pupils may lead to an increased risk of abuse.

All pupils know that there are adults to whom they can turn in school if they are worried, including the DSL, deputy DSLs,

principal, class teachers, and other familiar staff. Pupils are also able to write their concerns and place them in the Worry Box and have access to Worry Monsters. All messages placed in the Worry Box are read, and any issues of concern are followed up with the children involved.

St. Andrew's also has the following in place:

- All pupils have access to a telephone in school, enabling them to call for support from a helpline. The number for Childline (0800 11 11) is available on posters throughout the school;
- Safeguarding notices are displayed in our corridors giving advice on where pupils can seek help;
- Children are made aware of the potential threats posed by online abusers. Staff ensure that children know and understand ways to keep themselves safe online, supported by ongoing e-safety workshops for all pupils;
- Any child who has been abused will be supported in accordance with the agreed safeguarding plan;
- We recognise the need to be alert to risks posed by strangers or others who may wish to harm children in school or when travelling to and from school and take all reasonable steps to lessen such risks.

7. Recognising types and signs of abuse, neglect, or exploitation

7.1. Types of abuse

Abuse is a form of maltreatment of a child, including where they see, hear or experience its effects. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (KCSIE paragraph 26).

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. Abuse 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**.** Different types of abuse require different approaches (see KCSIE, Annex A & B). Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Child abuse can be categorised into the following distinct types:

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse

We also recognise that children can be in situations that cause grave concern and might put them at a higher risk of harm – this is NOT a distinct category but is dealt with separately (details further below).

Staff should be aware that children with SEND may show different or more subtle signs of abuse or neglect. This may include withdrawal, changes in behaviour or communication, or regression in skills. Barriers such as communication difficulties may make disclosure more difficult.

7.2. 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. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including

exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs**.**

Signs of possible neglect include:

- the child seems underweight or is very small for their age, or their weight deteriorates
- the child seems very overweight for their age
- they are poorly clothed, with inadequate protection from the weather
- they are often absent from school for no apparent reason; or persistently arrive late
- they are regularly left alone, or in charge of younger brothers or sisters

7.3. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Signs of emotional abuse tend to be behavioural rather than physical. If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention, and require more discipline than other children
- become angry or disinterested and/or show little creativity
- seem frightened of certain adults
- become sad, withdrawn, or depressed
- have trouble sleeping
- develop eating disorders
- self-harm
- refuse to attend school or run away from home
- lack confidence or have low self-esteem
- use drugs or alcohol.

7.4. Physical Abuse

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

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- respiratory problems from drowning, suffocation, or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks (grip marks) or caused by an implement
- cigarette burns, human bites; or scarring, scalds and burns
- fractures

- poisoning and other misuse of drugs e.g., sedatives

7.5. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;
- urinary infections
- difficulty walking, sitting, or standing
- persistent sore throats
- stomach-ache;
- detailed sexual knowledge inappropriate to the age of the child
- behaviour that is excessively affectionate or sexual towards other children or adults
- unusually explicit or detailed sex play in young children
- the drawing of pornographic or sexually explicit images

7.6. Grooming or Child Sexual Exploitation (CSE)

The school recognises that child sexual exploitation may affect children of any age and that a child's apparent willingness does not indicate consent. Where a child displays behaviour that may suggest exploitation, including behaviour that could itself be considered harmful or unlawful, this will be treated as a safeguarding concern and referred to the Designated Safeguarding Lead.
Grooming or child sexual exploitation (CSE) is a form of child abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, abuse, or deceive a child or young person. The victim may have been sexually exploited even if the sexual activity appears consensual. Many children and young people do not understand that they have been groomed or sexually exploited, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Child sexual exploitation or grooming does not always involve physical contact; it can also occur through the use of technology. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.
The school is alert to the risk of organised grooming and exploitation. Staff are trained to recognise early indicators that a child may be subject to grooming by a group or network, and any such concern will be referred to the DSL who will liaise with children's social care and, where appropriate, the police.

Indicators of CSE/grooming may include:

- unexplained gifts or new possessions
- being very secretive, including about what they are doing online
- spending much more time online, texting or using social media

- appearing withdrawn or upset after using the internet or texting
- friendships with much older people and meeting them in unusual places
- display behavioural changes
- changes in emotional wellbeing e.g.: present as suicidal, self-harming or feeling unworthy
- have sexual health issues
- have access to drugs and alcohol
- periods of unexplained absence from home and/or school

7.7. Female Genital Mutilation (FGM)

FGM is a form of abuse that involves the partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal in the United Kingdom under the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015).
FGM is a safeguarding issue and a form of child abuse. It is a criminal offence to carry out, assist in, or fail to protect a girl from FGM.
Whilst all staff should report any concerns immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL, there is a specific legal duty on regulated teachers under the FGM mandatory reporting duty.
Under this duty, where a teacher in the course of their professional duties discovers that an act of FGM appears to have been carried out on a girl under the age of 18, it is mandatory that the teacher must report this directly to the police as soon as possible and without delay, using the non-emergency number 101, in line with statutory guidance.
The teacher should also inform the DSL or Deputy DSL at the earliest opportunity after making the report, so that appropriate safeguarding action and support can be put in place.
This duty applies to "known" cases of FGM identified through disclosure or visual evidence; it does not apply to suspicion alone. Where there is a concern that a child may be at risk of FGM, this must be reported immediately to the DSL, who will consider appropriate referral to Children's Social Care and/or the police.
Staff must be aware of warning signs and risk factors for FGM and understand that concerns may arise from:

- disclosure by a child or family member
- behavioural indicators or distress
- family history or community risk factors
- concerns raised by other professionals

All concerns relating to FGM risk or disclosure must be treated as urgent safeguarding matters and acted upon without delay in line with KCSIE 2026 and local safeguarding partnership procedures.

7.8. Forced Marriage

Forced marriage is a marriage that is entered into without the full and free consent of one or both parties and where violence, threats, deception or any form of coercion is used to cause a person to enter into a marriage.
Forced marriage is a form of abuse and a violation of children's rights and may constitute a form of child abuse and/or safeguarding concern.
The Forced Marriage Unit (FMU) provides statutory guidance and specialist advice, which is available in the links in the appendices to this document, and staff should refer to this where appropriate.
If any member of staff receives a disclosure, suspects, or is aware that a forced marriage is being planned or may take place, this must be reported immediately and without delay to the Designated Safeguarding Lead (DSL) for Child Protection.
The DSL will consider urgent safeguarding action, which may include referral to Children's Social Care and/or the Police, and where appropriate contact with the Forced Marriage Unit.
Forced marriage is a criminal offence in England and Wales under the Anti-social Behaviour, Crime and Policing Act 2014, and any concerns must be treated as high-priority safeguarding matters.
Staff must be aware that in cases of forced marriage there may be an imminent risk that the child or young person is:

- taken out of the country
- withdrawn from school
- isolated from support networks
- subject to coercion or threats from family members or community members

Where there is an immediate risk of removal from the country, urgent action must be taken without delay, including immediate referral to the DSL and consideration of police involvement.
Any marriage involving a person under the age of 18 is illegal in England and Wales, regardless of whether consent is given.
Staff should always act with professional curiosity and not assume that a child has capacity to consent due to age or apparent compliance, as coercion and control may not be visible.

7.9. Honour Based Abuse

Honour-based abuse (HBA) is a crime or incident committed to protect or defend the perceived honour of a family and/or community. It is a form of abuse and can affect both children and adults.
It may include a range of criminal behaviours and harmful practices, including (but not limited to) female genital mutilation (FGM), forced marriage, so-called honour-based violence, and harmful practices such as breast ironing.
HBA is a form of domestic abuse, child abuse and contextual safeguarding risk, and may involve coercion, control, threats, intimidation, isolation and violence.
Not all honour-based abuse involves physical violence; it may also include emotional abuse, psychological coercion, controlling behaviour and social restriction. Staff should therefore remain alert to non-visible indicators of risk.
These may include signs such as:

- changes in behaviour, attendance or engagement
- withdrawal from peers or activities
- anxiety, fearfulness or distress
- unexplained injuries or restrictions on movement
- excessive control by family members
- reluctance to speak openly in school

Staff should understand that victims may be under significant pressure not to disclose abuse and may not recognise their situation as abusive.
Any concern that a child may be at risk of honour-based abuse must be reported immediately and without delay to the Designated Safeguarding Lead (DSL).
The DSL will consider appropriate next steps, which may include referral to Children's Social Care and/or the Police, and where relevant liaison with specialist safeguarding services.
Honour-based abuse is a serious safeguarding concern and may involve significant risk of harm, including escalation to life-threatening situations.
Staff must always act with professional curiosity and a safeguarding-first mindset and must not assume that a child is safe due to family involvement, apparent consent, or absence of visible injury.

7.10. Sharing of Nude and Semi-Nude Images (formerly known as 'Sexting

Sexting is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Pupils are taught about sexting as part of their internet safety education. The school takes incidences of sexting extremely seriously and deals with them in accordance with child protection procedures, including reporting to the police.

Staff should also be alert to the emerging risks posed by artificial intelligence (AI), including the creation and distribution of deep-fake images or videos of children. These may be used to harass, groom, blackmail, or exploit young people. AI-generated abuse is a growing concern, and any suspected use must be referred to the DSL immediately.

7.11. Dealing with consensual and non-consensual sharing of nude and semi-nude images

The law- Making, possessing and distributing indecent imagery of someone under 18 is illegal. 'Indecent' imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing e.g., displaying genitals and/or breasts or overtly sexual images of young people in their underwear

- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal.

7.12. Our approach

The following general principles and guidelines should be followed:

- the response to all incidents should be in line with the School's Safeguarding and Child Protection Policy.
- any direct disclosure by a pupil of an incident of sharing sexual imagery should be taken very seriously.
- the incident should be referred to the DSL as soon as possible.
- the DSL should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding team.
- there should be subsequent interviews with the children or young people involved (if appropriate)
- any relevant facts about the children or young people involved which would influence risk assessment
- if there is a need to contact another education, setting or individual
- whether to contact parents or carers of the children or young people involved-in most cases they should be involved

An immediate referral to police and/or children's social care through the MASH or equivalent should be made if at this initial stage:

- the incident involves an adult
- there is reason to believe that the child or young person has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's development stage or are violent.
- the image involves sexual acts and any child or young person in the images or videos is under 13.
- you have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

If none of the above apply, the school may decide to respond to the incident without involving the police or children's social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

The decision to respond to the incident without involving the police or children's social care should only be made in cases where the DSL is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the education setting's pastoral support and disciplinary framework and, if appropriate, their local network of support. The decision should be made by the DSL with input from the Principal and leadership team and input from other members of staff if appropriate. The decision should be made and recorded in line with St. Andrew's safeguarding and child protection procedures and should be based on consideration of the best interests of any child or young person involved. This should take into account proportionality as well as the welfare and protection of any child or young person. The decision should be reviewed throughout the process of responding to the incident.

If doubts remain after following child protection procedures, local safeguarding arrangements should be followed.

7.13. Sexual violence, sexual harassment, and up skirting

Being subjected to harassment, violence and/or abuse, including that of a sexual nature, may be a breach of a child's basic human rights. Sexual violence includes sexual offences which fall under the Sexual Offences Act 2003.

Sexual harassment refers to 'unwanted conduct of a sexual nature.' This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to

making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes), which can also occur outside of school. Sexual violence and sexual harassment can be a form of child-on-child abuse.

'Up skirting' under the terms of the Voyeurism Act (2019), "a new criminal offence and typically refers to the taking of a photo under someone'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.

Children with SEND are more vulnerable to sexual violence and sexual harassment, and there may be barriers in recognising abuse in this group of children. In addition, children who are perceived by their peers to be LGBT or identify themselves as LGBT may be more vulnerable.

Key Points from the guidance:

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum
- encourages forums that enable children to talk about issues openly
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment
- provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them, and
- provides guidance on difficult scenarios which schools might encounter, for example: how to handle an incident between two pupils which is alleged to have taken place away from school premises.

Staff will always work to support the victim and continue to create an environment for abuse to be confidently reported by the children. Staff will always act in the best interest of the child, giving immediate consideration to how best to support and protect the victim and the alleged perpetrator.

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed. If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be made. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

If the victim moves to another school, the school will be made aware of the ongoing matter and support provided by the school.
When a pupil who is the subject of a child protection file moves to another school, the DSL will transfer the file securely and directly to the receiving school's DSL within five days. Where the file includes concerns about harmful sexual behaviour, violence, or significant contextual risks, the DSL will make direct contact with the receiving school's DSL to discuss those concerns before or alongside the transfer of documents.

7.14. Children Missing Education

St. Andrew's acknowledges its legal duty to report any pupil who fails to attend school regularly, or who has been absent without the school's permission for a continuous period of 10 school days or more, as part of our responsibility to report children who are "missing education". The Child Missing Education Policy should be read in conjunction with

this policy.

7.15. Grave Concern/at risk

This is not a separate category of child abuse as such but covers a number of situations where a child may be at risk, for example where family, social and medical assessments indicate that they are at significant risk of abuse or where a child shows symptoms of stress and distress (see below). Children may be considered at risk if there is a known child abuser in the family or if another child in the family is known to have been abused; or if there is an adult in the family with a history of violent behaviour. The following situations may cause a child to be at risk:

- **Domestic Violence (DV):** children can be victims of domestic abuse. Domestic abuse encompasses a wide range of behaviours and may be a single incident of multiple incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial, and emotional. Children's exposure to parental conflict and abuse, even where violence is not present, can lead to serious anxiety and distress. Prolonged and/or serious domestic abuse can have a serious impact on a child's development and emotional wellbeing, including in their own intimate relationships as they mature into adulthood. We also recognise that even where the child is not the direct target of domestic violence and abuse, the harm caused to the child can be significant through emotional and physical abuse, and often neglect, as the victim's capacity to parent effectively and protect their child is diminished through a preoccupation with their own survival.
- The school is registered with Operation Encompass. When a notification is received that a child has been present during a domestic abuse incident, the DSL will be informed before school begins and will liaise with the child's teacher to ensure appropriate, sensitive support is in place for that day. Records of all notifications and actions taken will be kept on the child's safeguarding file.

- **Hidden Harm:** this may be the result of alcohol and/or substance misuse by the parent/carer. The child may feel anxious for their parent/carers' well-being which may impact negatively on their own well-being. Although we acknowledge the resilience of children, staff still have a responsibility to alert the DSL to their fears for children suffering hidden harm.

- **Child criminal** exploitation and County Lines: The school understands that child criminal exploitation can affect primary-age children and that coercion and control are central to how it operates. Staff are trained to recognise the indicators and will refer any concern to the DSL without delay. Behaviour arising from exploitation will be treated as a safeguarding matter, not a conduct issue.
  A geographically widespread form of harm that is a typical feature of county lines criminal activity, which is the criminal exploitation of children and young people. This is usually through engaging them in gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market, and seaside towns. All staff should be aware of indicators, which may signal that children are at risk from, or involved with, serious violent crime. These can include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. The experience of girls who are criminally exploited can be different to that of boys and that both girls and boys who are criminally exploited may be at higher risk of sexual exploitation.

    - **Weapons and serious violence:** Staff must report any concern that a child is carrying, using, or has access to a weapon, or has expressed an intention to use one, to the DSL or a deputy without delay. The DSL will assess the level of risk and take appropriate action, which may include contacting the police or children's social care, in line with KCSIE and local safeguarding partnership procedures. This may also be an indicator of wider safeguarding concerns, such as criminal exploitation or county lines involvement, and should be considered alongside other risk factors rather than in isolation.

- **At risk of radicalisation:** for those children who are deemed to be at risk of radicalisation, St. Andrew's will consider the level of risk in order to identify the most appropriate referral. Such referrals could therefore include Channel and/or Children's Social Care. Normally, decisions to seek support for a child at risk of radicalisation are taken in conjunction with parents, but St. Andrew's recognises its responsibility to make a referral without consent should the circumstances dictate such a course of action. St. Andrew's assesses the risk of children being drawn into terrorism and identifies who may be at risk of radicalisation. St. Andrew's supports pupils to build resilience towards the risk of radicalisation using PSCHE lessons, suitable workshops from external providers and RSE.

Signs a child is at risk of radicalisation may include:

- sudden behavioural changes
- a fixation on ideology or conspiracy theories
- isolation from friends and family
- expressions of extremist views
- attempts to access extremist materials online

Staff should refer any concerns to the DSL, who will consider referral to the Channel programme or other relevant support.

7.16. The Symptoms of Stress and Distress

St. Andrew's understands that it has an important role to play in supporting the mental health and wellbeing of our pupils (see Mental Health Policy). 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. A pupil showing signs of mental and emotional illness will be promptly referred to Children's Social Services. The child's parents will be informed that a referral is going to be made but the referral is not dependent on the parents' approval. When a child is suffering from any one or more of categories of abuse, or if that child is identified as 'at risk', he/she will nearly always suffer from or display signs of stress and distress:

- a lack of concentration and a fall-off in school performance;
- aggressive or hostile behaviour
- moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences;
- difficulties in relationships with peers
- regression to more immature forms of behaviour, e.g., thumb sucking
- self-harming or suicidal behaviour
- low self-esteem
- weariness, insecurity, running away or truancy - children who persistently run away from home may be escaping from sexual/physical abuse
- disturbed sleep
- general personality changes such as unacceptable behaviour or severe attention seeking behaviour;
- a sudden change in school performance

7.17. Child-on-Child Abuse

Child-on-child abuse is a specific safeguarding issue where one child causes harm to another, either online or offline. This may include sexual violence or harassment, physical abuse, discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents), bullying (including cyberbullying), coercive or controlling behaviour, upskirting, initiation/hazing violence and rituals, and abuse in intimate relationships.

Children with SEND or those identifying as LGBTQ+ may be particularly vulnerable. All incidents are taken seriously and responded to in line with child protection procedures. Staff will never dismiss such behaviour as "banter" or "part of growing up".

8. Vulnerable children

Children with special educational needs and/or disabilities are statistically more vulnerable to child abuse, including child on child abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children.
These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so

To address these additional challenges, children with SEND may require extra pastoral support. The additional vulnerabilities of pupils with SEND and the school's duty to make reasonable adjustments should be particularly carefully considered in situations where the use of reasonable force may be needed in response to risks presented by incidents involving children with SEND or medical conditions.

In addition, children who are perceived by their peers to be LGBT or identify themselves as LGBT may be more vulnerable to child-on-child abuse.

St. Andrew's will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after, by the local authority.

St. Andrew's acknowledges its responsibility to ensure that its provision for children in need of additional support reflects the most recent DfE advice and information which dovetails with Working Together and the SEND Code of Practice. St. Andrew's is particularly aware of the guidance provided in the following documents:

- Mental health and behaviour in schools (November 2018)
- Counselling in schools: a blueprint for the future (February 2016)

8.1. Looked after and previously/recently looked after children:

St. Andrew's will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after, by the local authority.
Looked After Children (LAC) - Children who are currently looked after or were previously/recently looked after, are highly vulnerable to abuse and exploitation. Therefore, the school ensures that they share information within the school and with statutory partners promptly and make arrangements to support their educational progress and promote good outcomes.

St. Andrew's Responsibilities:

- Ensure staff have the training to keep these children safe
- Promptly share safeguarding information
- Provide educational support to promote positive outcomes
- Follow DfE and SEND guidance

9. Responding to and reporting concerns

9.1. Raising a concern

St. Andrew's prides itself on being an environment in which all staff feel it is their individual and collective responsibility to raise a concern if they have concerns that a child is being abused in any way or is at risk of harm. All staff are supported in their safeguarding role and should exercise the right to make a referral to an external agency as outlined in the KCSIE guidance or directly to the NSPCC.

9.2. Actions to take on receiving a disclosure

Child abuse is devastating for the child and can result in distress and anxiety for staff who become involved. In such circumstances, staff should discuss their feelings with the DSL. It is vital that our actions do not abuse the child further or prejudice further enquiries, for example:

- listen to the pupil and be supportive. Even if you are shocked by what is being said try not to show it but do allow the pupil to speak freely and lead the discussion
- never stop a pupil who is freely recalling significant events and do not press for details by asking questions, e.g. "What did they do next?;"
- remember NOT to appear judgmental in any way and do not admonish the pupil for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the pupil may interpret it as that they have done something wrong
- it is OK to observe bruises but not to ask a child to remove or adjust their clothing to observe them;
- if a disclosure is made the pace should be dictated by the pupil without being pressed for detail by being asked leading questions such as "what did they do next?" or "where did they touch you?" It is our role to listen not investigate. Use open questions such as "is there anything else you want to tell me?"
- do acknowledge how hard it was for them to tell you this, remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you
- do not criticise the perpetrator; this may be someone they love
- do not promise confidentiality but do reassure the pupil that they have done the right thing and explain to whom you will have to tell and why. It is important that you do not make promises that you cannot keep such as "I'll stay with you all the time" or "It will be all right now;"
- accept what the pupil says without challenge — reassure them that they are safe, that they are doing the right thing and that you recognise how hard it is for them
- ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- take all suspicions and disclosure seriously

9.3. Recording information

Staff should do the following when recording information:

- make some brief notes at the time or immediately afterwards, record the date, time, place and context of the disclosure or concern, recording facts and not assumptions and interpretation. The diagram in Appendix 4 can be used for recording any injuries sustained by the child. Notes must be signed and dated
- observed injuries and bruises are to be recorded on the body map

- note the non-verbal behaviour and the key words in the language used by the pupil
- it is important to keep your original notes and pass them to the designated person
- the DSL or principal will record the concern or disclosure on MyConcern
- MyConcern recording and case management system enables a clear and comprehensive summary of the concern, details of how the concern was followed up and notes actions, decisions and outcomes and lessons learned

9.4. Making a Referral

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation. The school retains rights to share, hold and use information to protect children from all forms of harm, promote their welfare and educational outcomes.

All referrals will be made immediately if any child is thought to be at risk of harm or is likely to be at risk of harm; this applies to all pupils in the school, including those in EYFS. Whilst the responsibility for making a referral rests with the DSL, care is taken not to impose high thresholds for such referrals.

St. Andrew's recognises that safeguarding is a responsibility that is shared by everyone; anyone can therefore make a referral. Although part of the referral process could include a conversation with the DSL, this is not a pre-requisite, nor is it necessary to obtain parental consent for referrals to statutory agencies. Should anyone other than the DSL make a referral, the DSL **must** be informed as soon as is practicable. It is important that children receive the right help at the right time in order to address risks and prevent issues escalating. It is incumbent upon every member of staff at St. Andrew's to recognise and act upon any early signs of abuse, neglect and exploitation. Clear records must be kept, and the child's views must be listened to. Staff involved should reassess concerns when situations do not improve and share information quickly and challenge inaction.

Other options could include a referral to specialist services or early help services in accordance with the local safeguarding children partnership. Children's social care assessment should consider where children are being harmed in contexts outside of the home, so the school will provide as much information as possible as part of the referral process, which allows any assessment to consider all the available evidence and enable a contextual approach to address such harm.

- **Children in Need** – referral to be made through the DSL to Children's Social Services (act immediately);
- **Children at Risk** – referral to be made through the DSL to Children's Social Services/Police if a crime has been committed (act Immediately / 24hours / 1 working day);
- once a referral has been made, Children's Social Services should decide, within ONE working day of a referral being made, upon the course of action to be taken and should inform the referrer of the outcome of their decision. Staff should follow up on a referral should that information NOT be forthcoming in a timely manner;
- if after a referral the child's situation does not appear to have improved, the DSL or the referrer should ensure that their concerns have been addressed in order that the child's situation improves;
- anyone can make a referral to children's social services or to the NSPCC.

Child protection referrals made by staff:

Safeguarding is everyone's responsibility. Whilst there is a route for reporting child protection concerns to the DSL, deputy DSL or the principal, if you believe that a child is at immediate risk of harm or may suffer significant harm if prompt action is not taken by the DSL/deputy DSL or principal, or they are not readily contactable for any reason, you can make a referral directly to the Local Authority or to the NSPCC, which has statutory powers to intervene.

Once you have made a referral, you must inform your DSL and principal, who will continue to support with statutory agencies and who will ensure that MyConcern is updated so that the Director of Schools and the Head of Safeguarding are made aware.

The DSL will update the staff member on the outcome of any statutory assessments and interventions relating to their child protection concern and referral, which must be treated with the utmost confidence and with a view to supporting the child whilst in their care during the school day.

Teachers reporting suspected or known cases of Female Genital Mutilation (FGM):

All teaching staff are under a legal obligation (Section 5B of the FGM Act 2003) to make a report themselves directly to the police of any suspected or known cases of FGM. Thereafter, they must inform the DSL of their concerns and action taken to inform the police. A teacher must discuss their concerns relating to FGM with the DSL or Principal prior to making a report to the police but should not delay in making their report.

10. Early Help

The school considers the following as additional indicators that a child may benefit from early help: being repeatedly removed from the classroom, being placed on a part-time timetable, and persistent attendance difficulties. Where any of these situations arise, the class teacher will discuss the child with the DSL to consider whether a referral for early help or family support is appropriate.

If early help is appropriate, the DSL or Deputy DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Services for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

The school considers the following as additional indicators that a child may benefit from early help: being repeatedly removed from the classroom, being placed on a part-time timetable, and persistent attendance difficulties. Where any of these situations arise, the class teacher will discuss the child with the DSL to consider whether a referral for early help or family support is appropriate.

Any child may benefit from early help, but all school 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

10.1. Confidentiality/record keeping

Staff have the professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies. If a pupil confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he/she has a responsibility to refer for the child's own sake. Within that context, the child should, however, be assured that the matter will be disclosed only to the people who need to know about

it. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and discussed with the DSL or the Deputy DSL.

Personal information about all pupils and their families is regarded by those who work at St. Andrew's as confidential. All staff will aim to maintain this confidentiality and all records relating to child protection incidents will be maintained by the DSL and only shared as is consistent with the protection of children.

Furthermore, St. Andrew's will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school, where that identification would identify the teacher as the subject of the allegation.

11. Child-on-child abuse

11.1. Recognising Child-on-child abuse

Education Development Trust operates a zero-tolerance approach to all forms of exploitation, abuse, and harassment, including harassment on sexual and discriminatory grounds, as set out in its overarching Global Safeguarding Policy and Protection from Sexual Exploitation, Abuse and Harassment Policy.

All staff should be alert to the risk of child-on-child abuse and understand their role in preventing, identifying, and responding to it. When dealing with child-on-child abuse, staff must report any concerns to the DSL. Child-on-child abuse is any form of abuse perpetrated by one child towards another child (allegations may come from within or outside the school or online). They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh' and should not develop high thresholds before taking action. Abuse is abuse and child-on-child abuse should be taken as seriously as abuse by adults.

Child-on-child abuse can be hidden abuse and just because it has not been previously reported does not mean that it is not happening. Child-on-child abuse could be causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party

Possible indicators of safeguarding concerns which may indicate child on child abuse are most likely to include:

- bullying (including online bullying that may be discriminatory)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- face to face prejudice based and discriminatory bullying
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- relationship abuse
- initiation/hazing type violence and rituals
- 'up skirting'

Child-on-child abuse rarely takes place in isolation and often indicates wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Children of all gender identities can both perpetrate and be the victim of child-on-child abuse, but this often manifests itself differently. Girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

Gender Questioning and Social transition

The school has regard to the guidance on children questioning their gender set out in Keeping Children Safe in Education. Any matter involving a child who is questioning their gender will be approached as a safeguarding matter, with the child's welfare and best interests as the primary consideration. The DSL takes the lead in coordinating the school's response.

The school will not initiate any process of social transition for a child. Where a child or their parent raises a request relating to social transition, the DSL will lead the school's response. All discussions and decisions will be recorded, and any steps taken will be considered carefully in light of the school's safeguarding responsibilities, legal obligations, and the individual child's welfare.

In cases where a child is questioning their gender, the school will involve parents as a matter of course, unless there is a specific and documented safeguarding reason not to do so. Any decision to proceed without parental involvement will be made by the DSL in consultation with the principal and, where appropriate, children's social care.

The school does not permit a child to use toilet or changing facilities designated for the opposite biological sex. Where a child does not wish to use the facilities designated for their biological sex, the school will consider whether suitable alternative provision can be made without compromising the safety, privacy or dignity of any other child. Any such decision will be made by the DSL and principal, recorded in writing, and reviewed regularly.

Where the school determines that separating children by biological sex is necessary for safety or fairness in sport or physical activity, this decision will be applied consistently and without exception. The school bases such decisions on the physical demands and contact nature of the activity rather than on any policy relating to gender identity.

11.2. When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low-level bullying (where the school's Anti-Bullying Policy should be followed) or age-appropriate sexual experimentation. Factors which may indicate that behaviour is abusive include:

- where it is repeated over time and/or where the perpetrator intended to cause serious harm
- where there is an element of coercion or preplanning
- where there is an imbalance of power, for example, as a result of age, size, social status, or wealth

This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL. Staff should be aware of the possibility of sexual violence and child to child sexual harassment (as described in Section 2.6.11) as a form of child-on-child abuse.
When managing cases of child-on-child abuse, the school will use appropriate terminology relating to victims, alleged perpetrators and perpetrators once an allegation has been substantiated by an internal and/or external investigation procedures.

11.3. How to identify victims of child-on-child abuse?

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from child-on-child abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document. Signs can include:

- failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard you would ordinarily expect
- physical injuries
- having difficulties with mental health and/or emotional wellbeing
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Victims will be reassured that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report.

11.4. Children who are particularly vulnerable to abusing or being abused by their peers

Any child can be affected by child-on-child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- child-on-child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour. The school uses the Brook Traffic Light Tool to support staff in assessing sexual behaviour between children. Any behaviour assessed as amber or red will be referred to the DSL. The school understands that harmful sexual behaviour exists on a continuum and that early intervention is essential. Behaviour will not be dismissed as curiosity where it causes harm or distress to any child.
- children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives
- children with SEND and those who identify as LGBT+ are particularly vulnerable to both abuse and child on child abuse

11.5. Raising awareness of, and reducing the risk, of child-on-child abuse

Staff are trained in the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify and respond to it. The school recognises that abuse is abuse and should NEVER be tolerated or passed as mere "banter" or "having a laugh," as this could lead to a culture of unacceptable behaviours and unsafe environments. St. Andrew's actively seeks to prevent all forms of child-on-child abuse by educating children and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying (no matter how trivial) promptly and appropriately This is achieved by the following:

- having in place a developmentally appropriate PSCHE syllabus which develops pupils' understanding of acceptable behaviour, assertiveness and keeping themselves safe
- opportunities supported by robust systems for any child to raise concerns with staff, knowing that they will be listened to, believed, and valued
- robust risk assessments and support for pupils identified as being a potential risk to other pupils

11.6. Reporting and responding to concerns about child-on-child abuse

Any pupil whose behaviour poses a threat to other pupils in terms of being likely to cause "significant harm" to other pupils should be referred to Children's Social Services in accordance with the local safeguarding partnership procedures. The pupil's behaviour will also be considered under the Anti-Bullying policy and Behaviour policy. Should there be reasonable cause to suspect that a pupil is suffering, or likely to suffer, significant harm, by another pupil or pupils, then any such abuse will be referred to local agencies. It would be an expectation that in the event of disclosures about child-on-child abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk.' When dealing with any concern or allegation of child-on-child abuse, staff should follow these steps:

- when an allegation is made by a pupil against another student, which is of a safeguarding nature it should be reported to the designated safeguarding lead (DSL) or the deputy DSL in the absence of the DSL as soon as possible, who will log details on MyConcern
- staff must report any concerns to the DSL and all staff must challenge abusive behaviours
- a factual record must be kept (as normal safeguarding child protection procedures) and updated with all actions and outcomes
- if the incident relates to sexual violence, it should not be investigated at this time. The DSL will contact Children's Social Services to discuss the case, and make a formal referral where appropriate

- if the allegation indicates that a potential crime has taken place the DSL will refer the case to the police
- if the incident relates to an allegation of bullying, an initial investigation should take place to ascertain facts prior to the school taking any action
- parents of both the alleged victim and the pupil being complained about should be informed, this should be discussed during the consultation with Children's Social Services
- a risk assessment will be drawn up at this time to protect all parties involved
- it may be appropriate to exclude the pupil against whom the report has been made for a fixed time in line with the school's Behaviour Policy
- police and social care will lead any investigation into allegations of sexual or physical violence, however where neither police nor social care thresholds are met, our school will then undertake a thorough investigation following our policies and procedures
- a risk assessment will be drafted along with an appropriate supervision plan
- support will be given to all pupils involved, and they will be involved in the relevant meetings and agree to the plans that are set
- the supervision plan will be monitored, review dates set as required and concerns only closed upon the satisfactory conclusion of a concern or allegation

12. Dealing with allegations against staff

St. Andrew's acknowledges its duty to act appropriately in cases of allegations against a member of staff, where that staff member will pose a risk of harm if they continue to work in regular or close contact with children in their current position. The following arrangements will be used if a staff member, who is currently employed at the school, has:

- behaved in any way that has harmed or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he/she would pose a risk of harm to children

Allegations against a staff member who is no longer employed will be referred to the Police. Allegations will always be dealt with in accordance with statutory guidance provided in KCSIE and set out in the Trust's Global Safeguarding Policy. If an allegation is made against a supply member of staff, the school will keep the supply agency informed and involved in the action being taken.

Allegations about staff, volunteers, supply staff, DSL, or DDSL should be reported to the principal immediately, without informing the adult to whom the concern or allegation relates.

St. Andrew's exercises its duty of care for all staff by providing support for any staff member facing an allegation. A named contact will be provided if the staff member is suspended and every effort will be made to deal with the allegation as swiftly as is practicable, in a fair and consistent way that supports both the child and the staff member, who is the subject of an allegation.

12.1. What should I do if I have an allegation?

Allegations about staff (including supply staff) or volunteers should be reported to the principal immediately, without informing the adult to whom the concern or allegation relates. The principal will liaise with the Local Authority Designated Officer (LADO) as set out below and inform the Director of Schools and/or Education Development Trust's Head of Safeguarding.

If the allegation is about the principal, it must be referred to the Director of Schools and/or Education Development Trust's Head of Safeguarding Adviser immediately, without informing the principal.

The Director of Schools or Head of Safeguarding will liaise with the LADO and will inform the Chief Executive of Education Development Trust. Allegations that meet the harm threshold – staff including contractors will be reported to the principal or in her absence the Director of Schools.

School staff/volunteer/agency staff and visitors

If a staff member has a safeguarding concern relating to a member of staff/volunteer/agency staff or a visitor, they must promptly report their concern or an incident directly to the Principal, who informs the DSL. The Principal will promptly escalate the report to the Director of Schools and Head of Safeguarding

The Head of Safeguarding will support the DSL to make a report to the local authority designated officer (LADO) if required, and support with case management, including internal reporting and external regulatory reporting. The Principal will keep the Director of Schools and the Head of Safeguarding informed on progress of a staff safeguarding concern, and the DSL will keep the Principal informed. Regular case meetings will be held between the Director of Schools, the Head of Safeguarding, DSL, and Principal to ensure prompt information sharing and decision-making.

Concerns/allegations relating to agency staff will be managed as if they were an employee and the employment agency will be kept informed of investigation findings, outcomes, and LADO advice.

The DSL will update the staff member on the outcome of any statutory assessments and interventions relating to their child protection concern, which must be treated with the utmost confidence and a view to supporting the child whilst in their care during the school day.

Safeguarding concerns relating to the Principal

If safeguarding allegations or concerns relate to the principal, a staff member or the DSL must make a prompt report to the Director of Schools, and the Head of Safeguarding who will report the concern to the LADO team and escalate a report to the Chief Executive who in turn will report to the Trustees.

The Head of Safeguarding is responsible for case management and the coordination of internal reporting and external regulatory reporting, including the LADO team, and works closely with the Director of Schools to ensure a prompt and satisfactory resolution to all concerns and allegations raised against the Principal in conjunction with appropriate external services.

Safeguarding concerns relating to the Director of Schools

If there is an allegation or concern relating to the Director of Schools, staff must promptly report to the principal, who must escalate a report to the Head of Safeguarding, who is delegated to coordinate and manage all staff safeguarding allegations and who will promptly escalate a report to the Chief Executive and Trustees.

The Head of Safeguarding will manage the concern or allegation in line with the Trust's staff safeguarding allegation procedure, which ensures prompt information sharing and decision making by the case management team, which includes the Global Head of HR. The Head of Safeguarding is responsible for managing all internal and external regulatory requirements and for ensuring that a case is managed to a satisfactory conclusion, in conjunction with external services.

Safeguarding concerns relating to the Head of Safeguarding

If any staff member has safeguarding concerns relating to the Head of Safeguarding, they must be promptly reported to the Director of Schools and the Director of People, who will inform the Chief Executive, who will take appropriate action, including reporting to the appropriate external authorities. With professional advice from statutory agencies, the Trust will investigate the concern to a satisfactory conclusion, ensuring all external regulatory reporting is completed.

In **all** cases, where a staff member has made a report within the above reporting procedures, the case management team will acknowledge their report and will take a full statement as part of the initial enquiry phase into any concern/allegation raised.

12.2. Dealing with an allegation

Once an allegation has been reported to the Principal, immediate contact (within one working day) should be made with the LADO to discuss the allegation, consider the nature, content, and context of the allegation, and agree a course of action including any involvement with the police. The Principal must also notify Education Development Trust's Director of Schools and/or Head of Safeguarding who will then notify the Trust's CEO. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child agreed.

St. Andrew's will not undertake its own investigation unless permission has been given by the LADO to do so. In borderline cases, initial informal discussions might take place with the LADO without naming the individual.

If the principal is the subject of an allegation, immediate contact should be made with the LADO, by usually by Education Development Trust's Head of Safeguarding or delegate including Director of Schools, to consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police.

12.3. Suspension

Suspension is not an automatic response when an allegation against a staff member is reported. The Trust will conduct a risk assessment, which will include guidance from other agencies, including the LADO, and in discussion with St. Andrew's, as to whether other duties or supervision are more appropriate in the

circumstances, while investigations are ongoing. If immediate suspension is considered necessary, a record of the rationale and justification for such a course of action will be retained.

12.4. Support for the staff member

Education Development Trust has a duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Support for the accused individual is vital to fulfilling this duty.
Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of there is an objection by the Children's Social Services or the Police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be given access to the employee support service provided by Education Development Trust. The member of staff will be allocated a named representative to keep them informed of the progress of the case and consider what other support is appropriate for the individual.

Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

St. Andrew's acknowledges its responsibility for confidentiality and to guard against unwanted publicity in the situation where an allegation has been made against a member of staff, right up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

12.5. Informing parents or carers of the child/children involved

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or the police or Children's Social Services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing, as set out in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, Children's Social Services, or the police as appropriate, will consider what support the child or children involved may need.

12.6. Allegation outcomes

There are 5 possible outcomes:

1. **Substantiated:** sufficient evidence to prove the allegation
2. **False:** sufficient evidence to disprove the allegation
3. **Malicious:** clear evidence to prove a deliberate act to deceive and the allegation is entirely false
4. **Unfounded:** no evidence/basis to support the allegation
5. **Unsubstantiated:** NOT the same as a false allegation; insufficient evidence to prove/disprove the allegation; unsubstantiated does NOT imply innocence or guilt

12.7. On conclusion of a case

There is a legal requirement for the proprietor, Education Development Trust, to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If an allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, Education Development Trust will refer the case to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff at a school, the matter will

be referred to the TRA to consider prohibiting the individual from teaching in relation to their professional misconduct.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

12.8. Whistleblowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk, or if they feel unable to raise an issue within the school or feel that their genuine concerns are not being addressed, they should in the first instance raise their concerns with either the Director of Schools or the Head of Safeguarding. If they feel that matters have not improved or addressed
satisfactorily and safeguarding risks continue, they should refer to Education Development Trust's Whistleblowing Policy and procedure, which sets out neutral and confidential whistleblowing reporting routes.

The NSPCC provides an external and confidential whistleblowing helpline available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8.00 am to 8.00 pm, Monday to Friday or email: help@nspcc.org.uk.

Safeguarding whistleblowing policy and procedure

If any staff member genuinely believes that any type of safeguarding concern, staff allegation or child protection concern has not been satisfactorily addressed by the reporting and case management procedure set out in this policy, or there are other safeguarding issues they wish to raise outside the reporting chain, thy can escalate their concerns via Ed Dev Trust's whistleblowing procedure via the confidential concerns email box or directly to the Trustee Chair of the Audit and Finance Committee (A&F) as set out in the Trust's Whistleblowing Policy and procedure.

All whistleblowing concerns are investigated by a small team who will ensure the highest levels of confidentiality and will report directly to the Chair of the A&F Committee, their findings, and recommendations. The whistleblower will be updated with the outcome of the investigation and actions taken to ameliorate and mitigate further similar incidents arising.

All whistleblowers can report their concerns without fear of reprisal even if the outcome of an investigation finds that their concerns are unproven or unsubstantiated. Anyone withdrawing their concern must be aware that an investigation will continue to ensure that there is a satisfactory conclusion.

Anyone reporting a concern via whistleblowing, and which is found to be of malicious intent, may be subject to disciplinary proceedings.

13. Low level concerns

Purpose & Importance

All staff are expected to report *any* concern no matter how small about the conduct of any adult (staff, visitor, etc.) toward children. The goal is to safeguard children, prevent abuse, and promote a culture of openness and trust. Adults who report concerns in good faith will be supported.

The safety and wellbeing of children at St. Andrew's is dependent on the vigilance of all our staff and their prompt communication to the DSL, Deputy DSLs or principal of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The school is conscious of its duty of care to pupils and will always act, including if alerted to the possibility of abuse arising from situations or people outside the school setting.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns, or allegations have been raised will not suffer any detriment unless the concern or

allegation is found to be substantiated.

If you are concerned about the behaviour or actions of any adult, speak to the Principal or Director of Schools.

13.1. Low-level concern procedure (including self-reporting)

The overarching aim of the school's procedure for dealing with low-level concerns is to facilitate a culture in which the clear values and expected behaviours which are set out in our Staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Staff Code of Conduct
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings
- help identify any weaknesses in the school's or Trust's safeguarding approach

13.2. What is a low-level concern?

Definition of Low-Level Concern
The term 'low-level' concern does not mean that it is insignificant. A low-level concern is behaviour that:

- is inconsistent with the Staff Code of Conduct, including actions or conduct outside work
- does not meet the harm threshold or is otherwise not serious enough to consider for formal referral to LADO

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

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

13.3. Reporting a low-level concern about yourself

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever

reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Staff Code of Conduct. In these circumstances self-reporting is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

13.4. Reporting a low-level concern about another adult

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Staff Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

13.5. How will a low-level concern be handled (including a self-report)?

Low-level concerns about a member of staff should be referred to the Principal. If there are low level concerns about the Principal, these concerns should be referred to the Director of Schools.

Reports about supply staff and contractors will be reported to the agency/business so potential patterns of inappropriate behaviour are identified. When it has been raised by a third party, the Principal should collect as much evidence as possible by speaking where possible with that person who raised the concern (name noted and respecting wishes to remain anonymous as far as reasonably possible), to the individual involved and to any witnesses.

Reports of low-level concerns will be recorded in writing, with details of the concern, the context in which it arose, and the action taken.

If a pattern is identified, the course of action taken might be internal disciplinary procedures or referring to LADO. The Principal will consider whether wider cultural issues enabled the behaviour to occur and if policies need revision or training is needed to prevent such happening again. The rationale for all decisions taken must be recorded.

Should the DSL receive a report of low-level concerns, they will discuss them with the principal as soon as possible and in any event within 24 hours of becoming aware of it. The principal will, in the first instance, satisfy themselves that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure. The circumstances in which a low-level concern might be reclassified as an allegation are where:

- the threshold is met for an allegation (see dealing with allegations against staff above)
- there is a pattern of low-level concerns which collectively amount to an allegation
- there is other information which when taken into account leads to an allegation

Where the principal is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a no-names basis.

Having established that the concern is low-level, the DSL or principal, as appropriate, will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary.
Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc.

The person to which the low-level concern relates should be informed of any concern raised about them once all risk has been identified and assessed. These are regularly reviewed so that potential patterns of concerning, problematic or inappropriate behaviour are identified and responded to

13.6. What records will be kept?

Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept centrally on MyConcern which logs all low-level concerns and will be retained until the staff member reaches normal pension age or ten years after if longer. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above, or
- the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance,

capability, or disciplinary procedure.

14. Staff Code of Conduct

All school staff are required to abide by Education Development Trust's overarching Code of Conduct and the school's local Staff Code of Conduct.
The staff code of conduct incorporates the guidance contained in part two of KCSIE, Annex A & B, and includes guidance on:

- staff/pupil relationships
- communications including the use of social media
- Whistleblowing (see separate whistleblowing policy)

Staff are made aware that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

The SCC gives clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil and includes guidance on changing arrangements in a nursery class, one-to-one tuition, music, performing arts or sports coaching, conveying a pupil by car and engaging in inappropriate electronic communication with a pupil (see also the policy for the use of Mobile 'Phones and Cameras in the EYFS and whole school).

Staff are strongly encouraged to ensure the following, in order to protect themselves against possible allegations, especially in situations which require a one-to-one involvement with a child, such as PE sessions and/or peripatetic lessons:

- if you engage in 1 to 1 tuition time with a child, leave the door open or as a minimum ajar, and inform the office of your location and time
- two members of staff should be present in circumstances when children are changing
- staff are NOT permitted to convey pupils by car under any circumstances
- staff MUST NEVER photograph children using personal equipment
- Y6 children are expected to hand in their mobile phones to the office at the beginning of the day and are strongly discouraged from using photographic equipment of that nature in school
- do not allow unknown adults unsupervised access to children
- physical contact should be kept to a minimum and only used when there is a genuine reason in relation to the activity or event, e.g. First Aid/PE etc.
- staff should choose their words and language carefully so they cannot be misconstrued or misinterpreted. Staff must not indulge in belittling or making jokes at the expense of children
- a minimum of two school staff should accompany children on outings (see Educational Visits Policy)
- assurance is gained that the staff of another organisation have been checked for suitability if they supervise the school's pupils on a site other than the school
- all staff are subject to the requirements in the Trust Whistleblowing policy and the requirements as laid down in safeguarding training. All staff must undertake annual safeguarding training to keep up to date
- as good practice, teaching staff should have regard for the DfE's Teachers' Standards, part two: personal and professional conduct, including not undermining fundamental British values.

Staff must ensure that their behaviour and actions do not place pupils or staff at risk of harm or of allegations of harm to a pupil. Staff should not engage in any of the following:

- over familiar pupil/teacher relationship
- sexual touching
- causing or inciting a pupil to engage in sexual activity
- engaging in sexual activity in front of a pupil
- for the gratification of an adult, causing a pupil to watch a sex act

Social Media (Facebook; Twitter; LinkedIn, Instagram, WhatsApp etc.) Staff must

be aware of the following:

- do NOT talk about St. Andrew's /work
- take care with your profile picture
- do not bring St. Andrew's/The Trust into disrepute
- do not be involved in any teacher-pupil contact
- no friending of pupils
- no sharing of photos with pupils
- be careful about your privacy settings and public profile photographs
- be careful about ALL posts, blogs, and comments online

14.1. Mobile Phones:

- have **no** telephone contact at all with pupils
- adhere to the St. Andrew's, Acceptable Use of Cameras and Mobile Devices at all times
- always use a school mobile phone when necessary to call parents
- **never** use your mobile to photograph pupils at any time: plays, concerts, or sporting events

14.2. E-mail Contact and Instant Messaging:

- never e-mail a pupil using a private e-mail address: use only school-based e-mail addresses and follow the St. Andrew's code of conduct for digital media
- never contact a pupil using social media

15. Safer Recruitment

St. Andrew's adheres to Education Development Trust's Recruitment Policy and procedures which are in accordance with the Independent School Standards and Regulations and include ensuring that at least one member of any recruitment panel involved in all stages of the recruitment process has undertaken the appropriate training in safer recruitment and carrying out all required checks and extra checks such as social media checks on the suitability of all staff and volunteers to work with children and young people**.**

Recruitment and pre-employment checks are carried out in line with the provisions of Part 3, Keeping Children Safe in Education for all new staff, internal appointments, corporate staff and trustees, including:

- arrangements are put in place if staff start work before their DBS disclosure has been obtained, and in all cases a Barred List Check and Prohibition Order check (if applicable) will have been undertaken. Relevant staff are also asked to confirm that they do not meet the criteria for disqualification under the Childcare Act 2006 and the 2018 Regulations;
- Early Years staff may not start work until a DBS and barred list check has been completed.
- the school obtains assurance that appropriate child protection checks are carried out and procedures apply to any staff or volunteer of another organisation who work with the school's pupils on another site (for example, in a separate institution)
- recognising that, from 1 September 2026, the Crime and Policing Act 2026 removes the supervision exemption from the definition of regulated activity, so that a volunteer who teaches, trains, instructs, cares for, or supervises children on more than three days in a rolling 30 day period, or overnight, is in regulated activity even where supervised by a member of staff, and requires an enhanced DBS check with children's barred list information before continuing in that role
- reviewing all volunteer roles, including those supporting trips, clubs and other school activities, to identify anyone who now falls within this definition, while recognising that occasional volunteers, such as a parent helping at a single event or a non-overnight day trip, are not affected

- mandatory checks, including Section 128 checks, are carried out centrally on the suitability of all people who serve on Education Development Trust's Board of Trustees
- where the school ceases to use the services of any person (whether employed, contracted, a volunteer or student) or the person resigns or otherwise ceases to provide his or her services because it is considered that the person may be unsuitable to work with children, Education Development Trust will make a referral to the Disclosure and Barring Service (DBS) in accordance with the procedural guidance;
- in cases involving teaching staff, Education Development Trust and the school will also decide whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching
- providing training for all school staff so they are alert to signs of abuse, neglect and exploitation, and all staff know to whom they should report concerns or suspicions of abuse, neglect, or exploitation
- ensuring all school staff keep themselves updated on safeguarding issues and child protection procedures by accessing advice, guidance, and training as appropriate to their role

16. EYFS

This policy applies to the school's provision for the Early Years Foundation Setting ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with responsibility for safeguarding within this setting are set out at the head of this policy and in the Key Contacts section of the Appendices
The school applies the requirements of Keeping Children Safe in Education alongside the welfare requirements set out in Section 3 of the Early Years Foundation Stage statutory framework. This applies to all school-based early years provision, including the school nursery and reception classes. The DSL ensures that safeguarding arrangements in these settings meet both sets of statutory requirements.

16.1. Use of mobile phones or cameras and other electronic devices with imaging and sharing capabilities

Throughout the setting all people in the EYFS are required to adhere to the ICT Acceptable Use Agreement on the use of mobile phones and cameras and other electronic devices with imaging and sharing capabilities: that is, that images of pupils may not be

stored on personal devices. Any images taken on personal devices will be transferred to school or systems as soon as reasonably possible and the personal copy permanently removed.

16.2. Safeguarding training for staff in the EYFS

In accordance with the Statutory Framework for the EYFS (July 2025), St. Andrew's undertakes to train all staff to understand its safeguarding policy and procedures and ensures that all staff members have up-to-date knowledge of safeguarding issues. EYFS staff will be trained at least every two years. Training will enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way. These signs may include:

- significant changes in children's behaviour
- deterioration in children's general well-being
- unexplained bruising, marks or signs of possible abuse, neglect, or exploitation
- children's comments which give cause for concern
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images

17. Internet safety and the use of mobile technology

St. Andrew's Online Safety Policy and ICT Acceptable Use Policy gives full details of the school's policy and procedures for keeping children safe online.

St. Andrew's seeks to give its pupils an age-appropriate understanding of how to promote both their own safety and well-being and that of other children; this includes online safety. The School is aware that the use of technology has become a significant component of many safeguarding issues. In supporting our pupils, St. Andrew's, looks to ensure that it has an effective approach to online safety in order to protect and educate our school community in their use of technology.

Specific advice is given to pupils on how to keep themselves safe, especially when using electronic equipment and accessing the internet. This is done through a variety of means, including the PSCHE programme, ICT lessons, form periods and assemblies.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization, 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 and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and nonconsensual sharing of nudes and semi- nudes and/or pornography, sharing other explicit images and online bullying
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

17.1. Filtering and Monitoring

St. Andrew's protects its pupils when accessing the internet via the School's network through the use of appropriate filtering and monitoring systems, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material. These are monitored by the ICT Manager/ technician who also monitors that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly. The school blocks access to potentially dangerous sites and, where possible, prevents the downloading of potentially dangerous files. Any online safety incidents are logged and dealt with appropriately in line with this policy. When pupils are using devices within lessons and clubs, staff physically monitor what the pupils are accessing, by regularly watching the screens of users.

All staff should be aware of the school's filtering and monitoring systems and how these reduce the risk of children being exposed to harmful content. Pupils are also educated about these systems and their role in keeping them safe online.

The ICT technician reports to the DSL regarding filtering and holds regular meetings to review safety procedures in place.

The filtering and monitoring provision is reviewed at least annually by the Director of Schools, who receives a written report from the IT provider outlining what the risks to school pupils could be and any counter measures the school is applying. This information is reviewed, recorded and provided to the Trustees. The Director of schools has reviewed the new Filtering and Monitoring Standards.

If pupils bring mobile phones into school, they are expected to give them in at the school office and collect them at the end of the school day when going home.

17.2. Remote Learning

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

- St. Andrew's 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 St. Andrew's provided or approved communication channels; for example, St. Andrew's provided email accounts and phone numbers **and/or** agreed systems
- 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 St. Andrew's Behaviour policy/code of conduct and EDT's ICT Acceptable Use Policies and Digital

Safeguarding Policy

- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies
- When delivering remote learning, staff will follow our Remote Learning and ICT Acceptable Use Policy**.**
- 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 will be informed who from the school their child is going to be interacting with online
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home

Letting of Facilities

- St. Andrew's does not currently let their facilities to others. However, if this changed, the school would gain assurance that any other body using the premises has safeguarding procedures in place.

18. Monitoring and Review

The implementation of this Policy will be monitored locally by the Designated Safeguarding Lead in the School who will report as required to the Principal. Head of Safeguarding will conduct an annual review of the policy and procedures and will provide updates as they arise throughout the year if required.

Education Development Trust, St. Andrew's proprietor, is responsible for carrying out an annual safeguarding audit which is normally conducted in the Autumn Term by the Trust's Head of Safeguarding. The annual review will be reported on by the Head of Safeguarding and Director of Schools to Corporate Safeguarding Committee (which is chaired by a trustee), which in turn reports to the Board of Trustees in order to monitor compliance and culture.

Other periodic checks are carried out by the Trust's Head of UK Independent Schools in order to monitor the effectiveness of the school's implementation of the safeguarding policy and procedures, together with a review of the safeguarding incidents that have arisen and how they were managed. The Trust also requires the DSL to submit a monthly return of safeguarding incidents to the Head of Safeguarding who will maintain and monitor MyConcern, the case management and reporting system. The Corporate Safeguarding Committee will receive a report on all safeguarding incidents to track trends, ensure incidents reach a satisfactory and compliant conclusion and all future risks are mitigated, reflecting on lessons learned.

It is St. Andrew's responsibility to demonstrate that the school contributes to interagency working in line with statutory guidance, Working Together, through effective communication and good cooperation with local agencies.

St. Andrew's recognises that should there have been a substantiated allegation against a member of staff, it will work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Deborah Leek-Bailey
Director of Schools /
Chair of Governors
Education Development Trust, Proprietor to St. Andrew's School
Date of Policy: 1st September 2026
Date of next Review: September 2027

Appendix 1: List of key contacts

This policy applies to all on and off-site activities undertaken by the pupils whilst they are the responsibility of the school.

The Safeguarding Partnership which sets the local procedures is **Medway**

Safeguarding Children Partnership www.medwayscp.org.uk **MSCP Office Address:**

5th Floor, Gun
Wharf, Dock
Road, Chatham,
Kent,
ME4 4TR 01634
336329
mscp@medway.gov.uk

Children Services Social Care (Children's Advice and Duty Services (CADS)

Medway Council Gun
Wharf Chatham
Kent ME4
4TR
01634 334 466

ss.access&info@medway.gov.uk

Out of hours - 03000 41 91 91

Kent Safeguarding Children Multiagency Partnership- KSCMP

Telephone: 03000 42 11 26

Email: kscmp@kent.gov.uk
Address: Room 2.71, Sessions House, Maidstone, ME14 1XQ

SAFEGUARDING LITERATURE MENTIONED IN THIS POLICY

Keeping Children Safe in Education 2026 (KCSIE)

Disqualification under the Childcare Act 2006 (July 2018)

https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006

What to do if you're worried a child is being abused (March 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Working Together to Safeguard Children 2026

https://assets.publishing.service.gov.uk/media/69c2c4ce380a2a73a7cf9df4/Working_together_to_safeguard_children_2026.pdf**Information sharing (March 2015)**
https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

Prevent Duty Guidance: for England and Wales (2021)

www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for- england-and-wales

The Prevent Duty: Safeguarding learner vulnerable to radicalization (October 2022)

https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation

The use of social media for on-line radicalisation (July 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf

Teacher misconduct: the prohibition of teachers (2018)

Teacher misconduct: the prohibition of teachers (publishing.service.gov.uk)

Mental Health and behaviour in schools (March 2018)

Mental health and behaviour in schools (publishing.service.gov.uk)

Counselling in schools: a blueprint for the Future (February 2016)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf

SEND Code of Practice (January 2014)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf

FGM

https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

Child Sexual Exploitation

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278849/Safeguarding_Children_and_Young_People_from_Sexual_Exploitation.pdf

Teaching Regulation Agency

https://www.gov.uk/government/organisations/teaching-regulation-agency/about

School Attendance

https://www.gov.uk/school-attendance-absence

Behaviour and discipline in schools January 2016

https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools

Children who Runaway or go Missing from Home or Care

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf

Domestic Violence and Abuse

https://www.gov.uk/guidance/domestic-violence-and-abuse

Drug Advice for Schools

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf

Fabricated or Induced Illness

https://www.nhs.uk/mental-health/conditions/fabricated-or-induced-illness/overview/

Faith Abuse

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action_Plan_-_Abuse_linked_to_Faith_or_Belief.pdf

Female Genital Mutilation

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

Forced Marriage

https://www.gov.uk/guidance/forced-marriage

Gangs and Youth Violence

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

Information sharing July 2018

https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing- advice

Mental Health

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213761/dh_12405 8.pdf

Private Fostering

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf

Preventing Radicalisation

Preventing and Tackling Bullying

Pupil screening, searching and confiscation Jan 2018
https://www.gov.uk/government/publications/searching-screening-and-confiscation

Sexting

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges May 2018

Trafficking

Violence against Women and Girls

https://www.gov.uk/government/policies/violence-against-women-and-girls

What to do if you Suspect a Child is being Sexually Exploited

https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually- exploited

Technical Guidance on the Public Sector Equality Duty

Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission (equalityhumanrights.com)

Appropriate Adult

PACE Code C 2019 (accessible) - GOV.UK (www.gov.uk)

Appendix 2

DSL and DDSL Job Description (copied from Appendix C KCSIE) Role of the designated safeguarding lead (DSL)

Annex C: Role of the designated safeguarding lead

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post.

The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out-of-hours/out-of-term activities.

Manage referrals

- The designated safeguarding lead is expected to refer cases:
    - of suspected abuse, neglect and exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care
    - to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
    - where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
    - where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college152. This includes:
- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should 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, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as

possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs coordinators (SENCO's) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse, neglect or exploitation may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies,
particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities

(SEND), those with relevant health conditions and young carers

- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

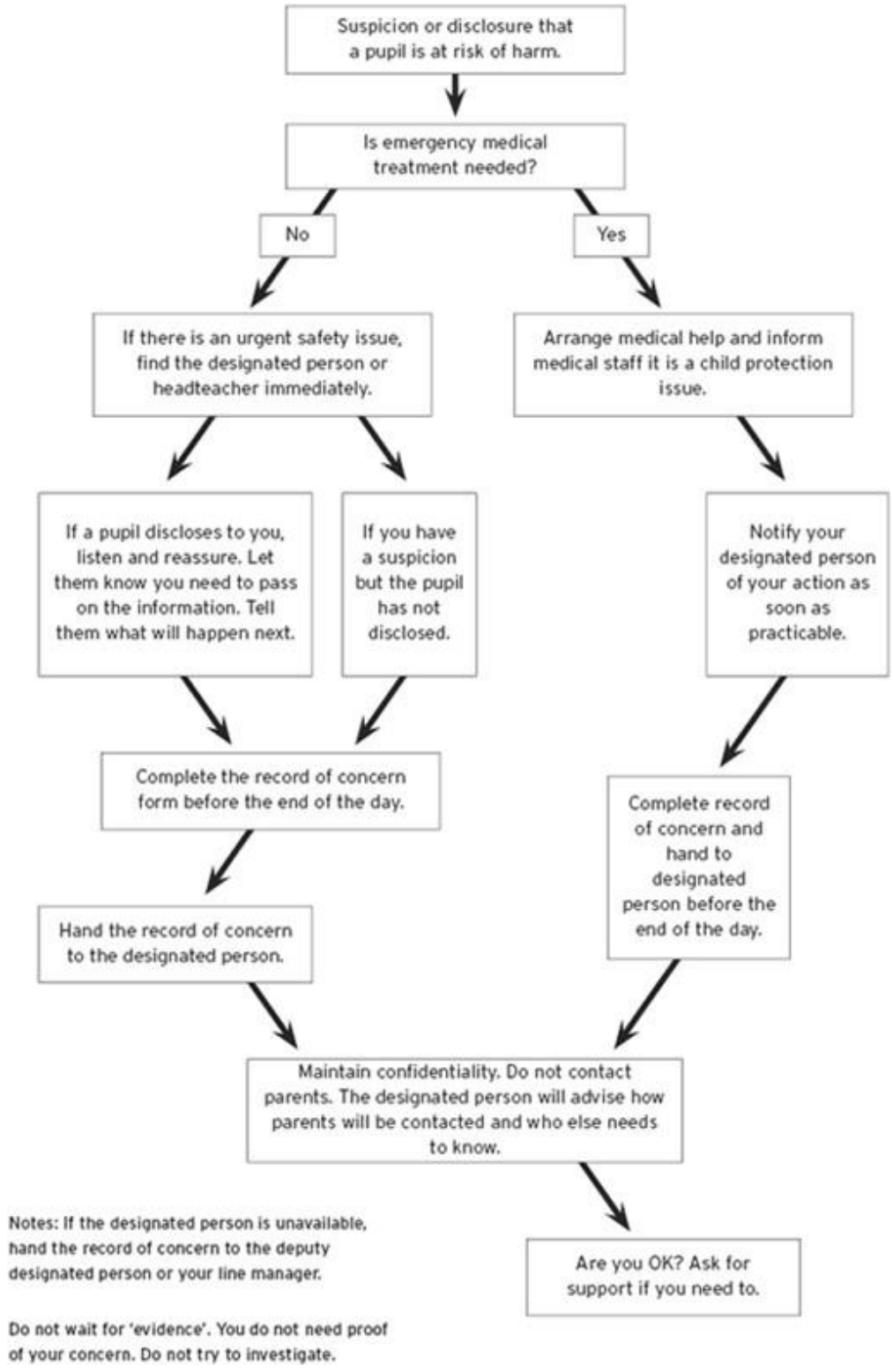
The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- to be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or

were not made to another agency such as the LA children's social care or the Prevent programme, etc.'

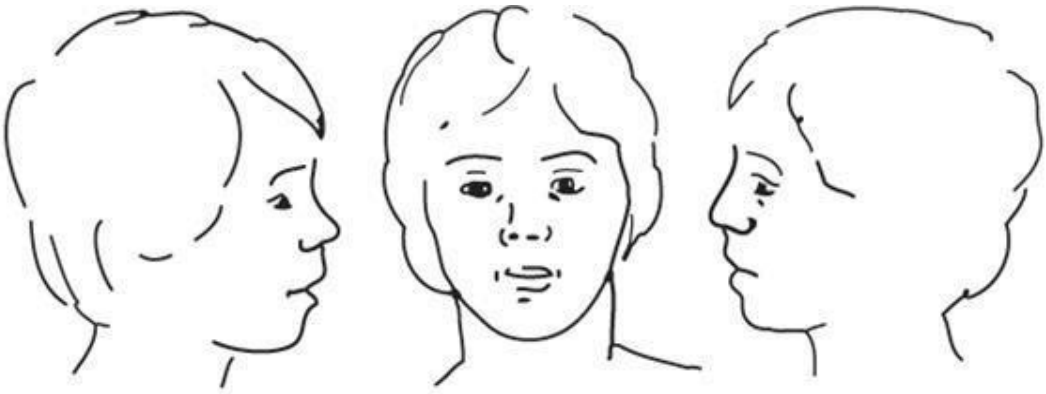
Appendix 3: Referral process (flowchart)

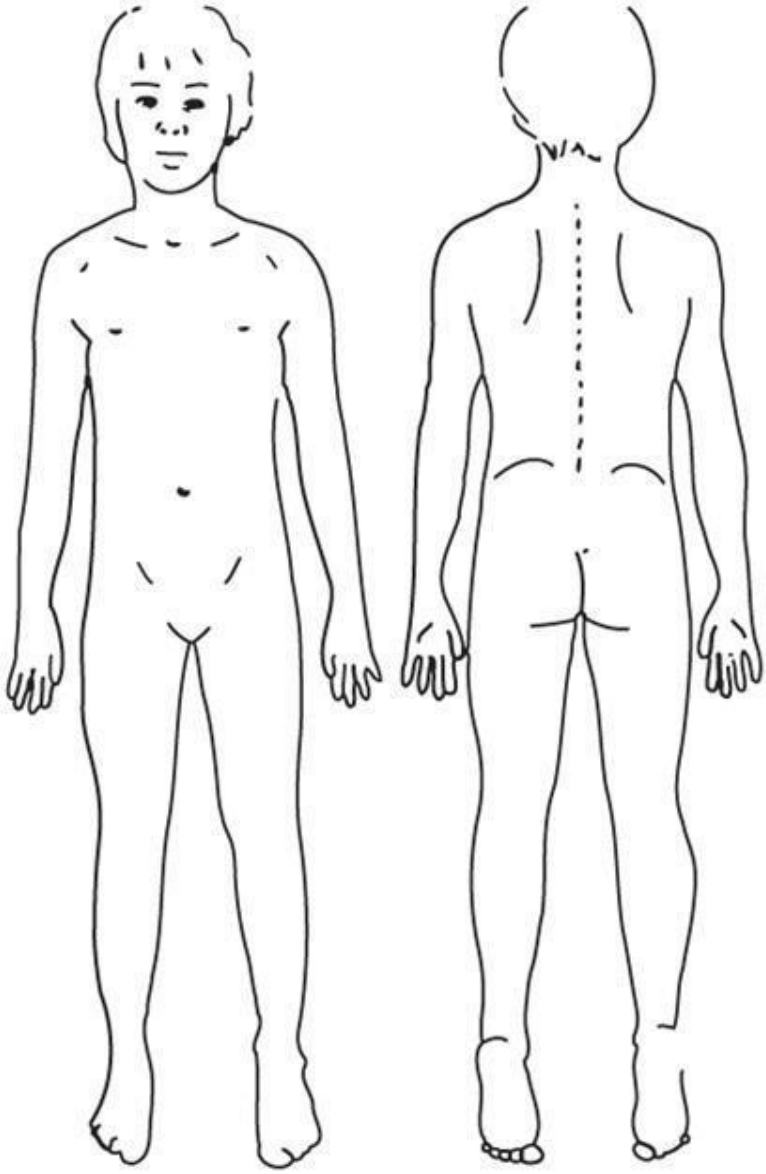
Reporting concern flowchart



Notes: If the designated person is unavailable, hand the record of concern to the deputy designated person or your line manager.

Do not wait for 'evidence'. You do not need proof of your concern. Do not try to investigate.

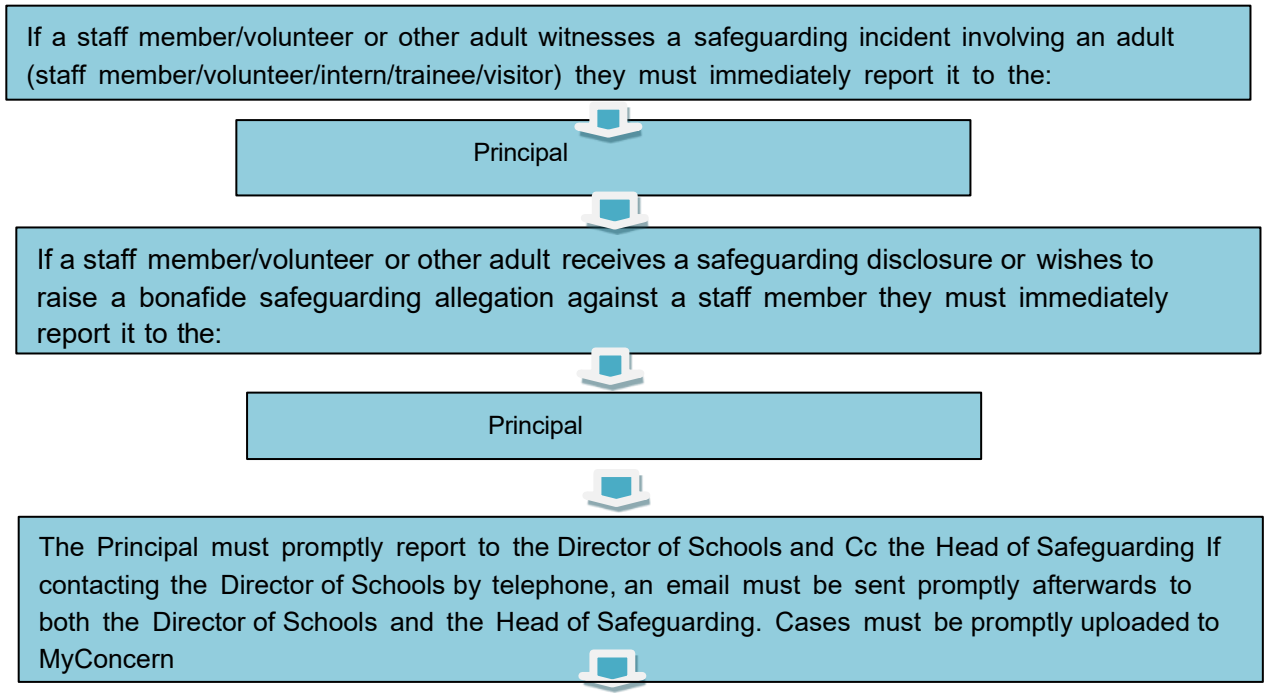




Appendix 4: Recording injuries

Appendix 5 Flowchart for managing allegations against staff

School's safeguarding incident/allegation against staff reporting flowchart



The Principal must promptly contact the local authority's designated officer, as per the local reporting procedures and must keep both the Director of Schools and Head of Safeguarding updated on the local authority's advice.

The Director of Schools /Head of Safeguarding will inform the Chief Executive of Education Development Trust of any serious safeguarding incidents and/or allegations involving staff. The Chief Executive of Education Development Trust will inform the Chair of Trustees.

At EDT, the Head of Safeguarding will maintain oversight and responsibility for ensuring the case is managed to conclusion and will undertake all internal and external regulatory reporting

The Principal is responsible for updating the Director of Schools and The Head of Safeguarding of local case management arrangements and the Head of Safeguarding will advise throughout

Mandatory external reports to the Charity Commission, barring referrals to the Disclosure and Barring Service, and referral to the Teaching Regulation Agency are coordinated by the Head of Safeguarding.

Staff can raise bonafide safeguarding concerns via the Whistleblowing Policy if they believe that their concerns are not being promptly and effectively acted upon by the school's Principal and or Director of Schools or the Head of Safeguarding